

# INTEGRATING NIMS INTO CSEPP

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## 1. INTRODUCTION

This paper provides guidance on incorporating requirements of the National Incident Management System (NIMS) into the plans, procedures, and other capabilities that communities have developed under the Chemical Stockpile Emergency Preparedness Program (CSEPP). It is aimed at emergency planners and managers in CSEPP communities, but some sections may be of interest to others with responsibility for emergency preparedness and response. This guidance should be used in conjunction with the Department of Homeland Security Document, “Local and Tribal NIMS Integration,” which describes techniques for integrating NIMS into overall emergency operations plans and procedures.

This paper assumes that its users already have a sound working knowledge of both NIMS and CSEPP. As such, it does not provide a thorough description of either of these programs. Other sources are available for complete information about NIMS and CSEPP.

### *SOURCES OF INFORMATION ABOUT NIMS AND CSEPP*

- *National Incident Management System,*  
[http://www.fema.gov/emergency/nims/nims\\_compliance.shtm#nimsdocument](http://www.fema.gov/emergency/nims/nims_compliance.shtm#nimsdocument)
- *National Response Plan,* [http://www.dhs.gov/dhspublic/interapp/editorial/editorial\\_0566.xml](http://www.dhs.gov/dhspublic/interapp/editorial/editorial_0566.xml)
- *National Incident Management System, An Introduction (IS-700),*  
<http://www.training.fema.gov/emiweb/IS/is700.asp>
- *Introduction to ICS (ICS-100),* <http://www.training.fema.gov/emiweb/IS/is100.asp>
- *ICS for Single Resources and Initial Action Incidents (ICS-200),*  
<http://www.training.fema.gov/emiweb/IS/is200.asp>
- *NRP Training, An Introduction (IS-800),* <http://www.training.fema.gov/emiweb/IS/is800.asp>
- CSEPP Planning Guidance and Programmatic Guidance found on the CSEPP Portal (registration required),  
<http://www.cseppportal.net/login.aspx?ReturnUrl=%2fSecure%2fhome.aspx>

When fully implemented, NIMS is intended to ensure consistency in the emergency preparedness and response efforts of jurisdictions and agencies at all levels of government as well as those of private sector and nongovernmental organizations. The significant benefits of such a consistent approach can be achieved only by making changes in existing emergency management and response organizational structures and emergency plans and procedures. Successful implementation of these changes presents a challenge to all of the affected organizations. The challenge is particularly strong for those, such as the CSEPP communities, that have developed sophisticated capabilities aimed at responding to a very

specific threat. It is imperative that these advanced capabilities be retained and enhanced as NIMS principles, doctrine, terminology, and organizational processes are incorporated.

Many NIMS requirements can be incorporated into the organizational structures, plans, and procedures of CSEPP communities in a relatively straightforward manner. Others will require careful consideration to ensure that critical CSEPP-specific capabilities are preserved as the standardized approaches are adopted. These two different types of changes are discussed in the following sections.



## **2. CLEAR-CUT STEPS TO INCORPORATE NIMS INTO CSEPP**

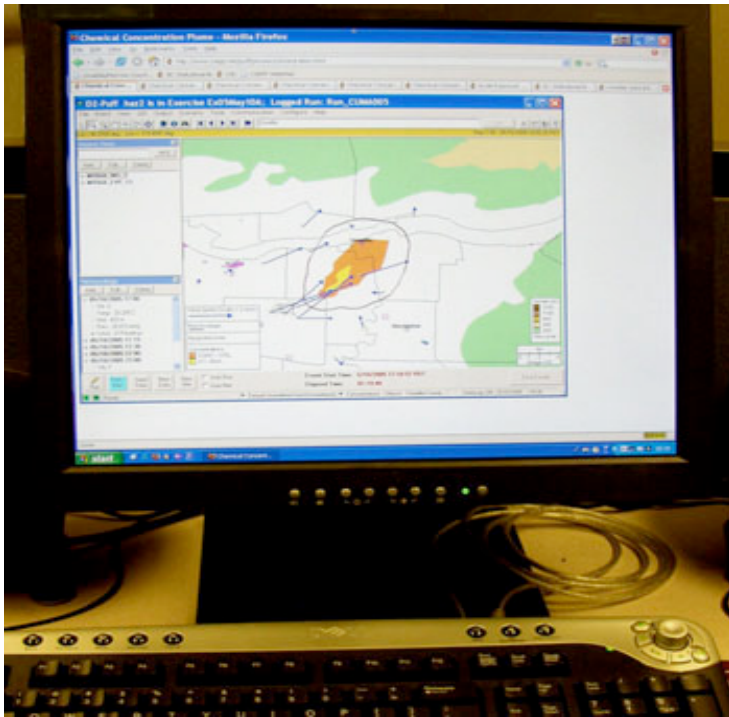
### **2.1 REVISE RESPONSE ORGANIZATIONAL STRUCTURE TO CONFORM TO THE INCIDENT COMMAND SYSTEM**

A centerpiece of NIMS is the use of the Incident Command System, or ICS, to manage the response to an incident. The ICS consists of a modular, flexible organizational structure along with principles to tailor its implementation to the needs of specific emergency situations. CSEPP communities can take several steps to organize their response forces in ways that will facilitate the implementation of ICS during the response to a chemical agent release or other emergency.

First, communities can identify candidates who may play central roles in an ICS responding to a chemical agent release. Most CSEPP plans define numerous positions for managing the response to a chemical agent release. The titles and definitions of these positions should be evaluated to ensure they conform to NIMS standards. Critical positions in the ICS structure include the Incident Commander, Public Information Officer, Liaison Officer, Safety Officer, and the Chiefs of the Operations, Planning, Logistics, and Finance and Administration sections. If the need is anticipated, the jurisdiction may also identify candidates for subordinate roles under these key positions, as described in Appendix A of the NIMS document. More than one candidate should be identified for each position, and all candidates should be trained to carry out their emergency response duties within the ICS.

Communities can also make sure they are prepared to take the legal steps necessary for implementing ICS. Most critical is establishing the Incident Commander's authority to assume control of the response effort. Depending on the governmental position this person occupies during non-emergency periods, he or she may already have the necessary authority. If not, authority will have to be delegated by the jurisdiction's chief elected official or legislative body. Steps should be taken to delegate this authority ahead of time or to make preparations for doing so quickly at the time of an emergency.

When implemented in response to an emergency, the ICS is expected to develop in a top-down fashion as the Incident Commander builds the response organization that best meets the needs of the particular emergency situation. The commander's ability to make these decisions at the time of an emergency may be strengthened if criteria to guide the decisions are developed during the preparedness phase. CSEPP communities are in an especially strong position to pre-define decision criteria since they are dealing with a well-defined threat from a known location and they have conducted detailed analyses of possible release and response scenarios.



**Figure 1. Using sophisticated analytical techniques, such as site-specific plume modeling, CSEPP planners have examined the ways a chemical agent release might affect their communities and have determined the most effective response strategies for diverse conditions.**

## **2.2 INCORPORATE ICS PROCEDURES INTO CSEPP PLANS AND PROCEDURES**

NIMS prescribes several procedures for ICS operations that may differ somewhat from those that have been developed under CSEPP. To ensure consistency among all responding organizations, CSEPP plans and procedures should be revised to conform to the ICS standards.

First, plans and procedures should incorporate ICS requirements for briefings at specific points during the response. Briefings are called for when a unit or resource is deployed, at the beginning of every operational period (or shift change), and any time there is a transfer of command from one Incident Commander to another. Typically, a briefing will cover the situation, mission/execution, communications, service/support, risk management, and questions or concerns.

NIMS also calls for careful documentation of the incident, including descriptions of the emergency situation and the measures taken to respond to it. Responsibility for central documentation is vested in the Planning Section of the Incident Command staff. Other units in the response organization are encouraged to maintain their own records.

Standardized forms provided by NIMS to help accomplish these and other incident management functions should be incorporated into CSEPP operational procedures where appropriate. Some forms developed specifically for CSEPP may meet needs not addressed by the NIMS forms. These CSEPP forms should continue to be used. The available NIMS forms can be downloaded from the FEMA ICS Resource Center.

STANDARDIZED FORMS AVAILABLE FROM  
[http://www.training.fema.gov/EMIWeb/IS/ICSResource/ICSResCntr\\_Forms.htm](http://www.training.fema.gov/EMIWeb/IS/ICSResource/ICSResCntr_Forms.htm)

### **2.3 ADOPT NIMS SYSTEM FOR CLASSIFICATION OF RESOURCES**

Communities participating in CSEPP have identified the resources that may be needed for a response to a chemical agent release, including resources that belong to the jurisdiction and others that could be provided by other jurisdictions or private sector organizations. However, to ensure consistency in the way resource capabilities are described, NIMS calls for resources to be categorized using standard terminology to describe their kind and type. “Kind” refers to a description of what the resource is—for instance, a medic, firefighter, ambulance, or helicopter. “Type” describes the size, capability, and staffing qualifications of a specific kind of resource. Type I resources provide the highest capability for a particular kind of resources, and Type IV resources provide the lowest.

By classifying their previously identified resources according to kind and type during the preparedness phase, CSEPP planners can facilitate implementation of ICS during the response phase. A worthwhile additional effort to support the intent of NIMS would be to develop a system for effective management of resources on a regional level rather than a strictly local level. Important resources will include those of the Army installation. However, it is not clear whether the Army will classify its personnel and equipment resources according to NIMS definitions.

The most recent standardized NIMS resource definitions are available from FEMA’s Resource Management and Mutual Aid web page.

STANDARDIZED RESOURCE DEFINITIONS AVAILABLE AT  
[http://www.fema.gov/emergency/nims/mutual\\_aid.shtm](http://www.fema.gov/emergency/nims/mutual_aid.shtm)

### **2.4 INCORPORATE NIMS VOCABULARY INTO ALL PLANS AND PROCEDURES**

One key objective of NIMS is standardization of the vocabulary used in emergency management and response. Standardization is desirable because it supports effective cooperative action when more than one agency or jurisdiction is involved in the response to an incident. CSEPP communities can realize the benefits of this standardization by revising their emergency plans and procedures to incorporate the language specified by NIMS. Critical terms include

- those describing organizational functions, such as Incident Command System, Incident Command, Unified Command, Area Command, Incident Management Team, Multiagency Coordination System, Emergency Operations Center, Branch, Division, Group, Unit, Task Force, and Strike Team;
- those designating incident facilities, such as Incident command post, staging area, base, and camp;
- resource descriptions, such as resources, tactical, support, kind, and type; and
- position titles, such as Incident Commander, Officer, Chief, Director, Supervisor, Leader, Deputy, Assistant, and Manager.

STANDARD NIMS DEFINITIONS ARE AVAILABLE AT

[http://www.fema.gov/emergency/nims/nims\\_compliance.shtm#nimsdocument](http://www.fema.gov/emergency/nims/nims_compliance.shtm#nimsdocument) (see Glossary)

[http://www.training.fema.gov/EMIWeb/IS/ICSResource/ICSResCntr\\_Glossary.htm](http://www.training.fema.gov/EMIWeb/IS/ICSResource/ICSResCntr_Glossary.htm)

## 2.5 INCORPORATE NIMS REQUIREMENTS FOR COMMUNICATIONS AND INFORMATION MANAGEMENT



**Figure 2. Some CSEPP communications systems use electronic data sharing to present a common operating picture to all agencies participating in the EOC and JIC.**

NIMS stresses the importance of two concepts for communications and information management during emergency response: first is a common operating picture accessible across jurisdictions and functional agencies; second is common communications and data standards. In general, CSEPP communities excel in implementing both of these concepts. At least one jurisdiction has established a wireless communication capability covering the entire community. In spite of these advanced capabilities, some further action may be needed to promote rapid implementation of communications under ICS.

NIMS calls for the Incident Commander to manage communications at an incident using a common communications plan and interoperable communications processes and architectures. CSEPP planners should ensure that equipment, procedures, and protocols are in place to support interoperable communications by all agencies and jurisdictions expected to be involved in the response to a chemical agent release. It is important to understand the data and information-sharing systems other federal, state, and local organizations will bring to a CSEPP response. Unless these outside systems are integrated into the CSEPP communications network, the organizations may use them independently, resulting in a disjointed operating picture. It should be noted, however, that on-post communications can never be fully interoperable with off-post systems due to military security-driven encryption requirements. In spite of this limitation, CSEPP has developed methods for effective on-post/off-post communications that should be incorporated into the communications plan.

The communications plan should be presented in a concise form that will be operationally useful to the Incident Commander. It should also avoid the use of codes and jargon and conform to the NIMS vocabulary.

The NIMS Integration Center oversees ongoing efforts to make additional progress toward common communications and data standards and systems interoperability. These standards should be incorporated into CSEPP plans and procedures as they become available.

## **2.6 ENSURE THAT ASSUMPTIONS AND PROVISIONS REGARDING THE RELATIONSHIP BETWEEN LOCAL/STATE AND FEDERAL RESPONSE CONFORM TO THE NRP**

At the direction of the President, the Department of Homeland Security has issued a companion document to NIMS called the National Response Plan, or NRP. This is an all-hazards plan for integrating and applying federal resources before, during, and after an Incident of National Significance. The NRP makes some changes in the organization the federal government will use to support state and local response efforts. Plans developed for CSEPP may need to be revised to ensure they are consistent with the NRP's provisions for interacting with federal response efforts and requesting federal resource support.

One important aspect of the federal response to a chemical agent release is *not* changed by the NRP. The Federal On-Scene Coordinator, or OSC, continues to have the authority to direct federal response efforts at the scene of a release of hazardous materials. Currently, for chemical events occurring on a military installation, the OSC will be either the installation commander or the commander of the Army's Service Response Force if this force is activated. However, the Army's approach to this matter is under review and may change.

The NRP does, however, make significant changes in the federal organization for providing support to state and local response efforts. During an Incident of National Significance (such as a chemical agent release with major off-site consequences), a Joint Field Office, or JFO, will be established in or near the affected jurisdiction. The JFO is a temporary federal facility that serves as a central point of coordination for federal support to incident management activities. Actions of the JFO are directed by a Coordination Group composed of selected federal, state, local, nongovernmental, and private sector representatives.

The JFO is organized according to an ICS structure; however, it does not manage on-scene operations. The JFO provides resource support to the Incident Commander and implementation of state and federal programs and functions. The JFO also addresses broader regional and national aspects of incident management. Key federal officials at the JFO will include a Principal Federal Official, who represents the Secretary of the Department of Homeland Security, and either a Federal Coordinating Officer, if a Stafford Act declaration has been made, or a Federal Resource Coordinator, if such a declaration has not been made. In the event of a terrorist incident, the coordination group also includes the Senior Federal Law Enforcement Official, normally the FBI Special Agent-in-Charge.

As a result of these changes, CSEPP plans, procedures, and processes for interacting with federal response and support efforts may need to be revised. In particular, the position titles of federal participants and the procedures for interacting with them may need to be updated. In addition, jurisdictions may want to identify individuals (and alternates) knowledgeable in CSEPP plans, procedures, and capabilities who would represent them in the JFO.

## **2.7 ENSURE ALL PERSONNEL HAVE APPROPRIATE TRAINING**

If NIMS is to achieve its goal of providing a single, consistent, nationwide approach for preparing for, preventing, responding to, and recovering from incidents, its provisions must be understood by all participants and, indeed, must become ingrained in the emergency management and response culture. The most immediate need is for widespread training in NIMS concepts, particularly ICS. These needs are not specific to CSEPP; however, since the response to a CSEPP release may involve different sets of responders and managers, CSEPP planners should consider whether the integration of NIMS entails special planning needs for the program.

The NIMS Integration Center has issued NIMS Training Guidelines based on courses that are currently available or soon to be available from DHS/FEMA's Emergency Management Institute. The guidelines spell out training requirements for entry level first responders and disaster workers, first line supervisors, middle managers, and command and general staff. Most of the courses are available in an on-

line, self-study format. Communities that rely on volunteers to assist in response efforts should also consider requesting these individuals to complete the appropriate level of training.

In addition to training in NIMS, ICS, and NRP, more specialized training needs may be identified as NIMS is incorporated into CSEPP at the national level and into local and state preparedness programs. In particular, the activity of resource typing, including personnel resources, to reflect national standards for capacity and capability, could reveal that some local units are not prepared to perform at the level needed in a CSEPP response. In such situations, additional functional training may be needed to bring the units and personnel up to the needed standard.

# Fact Sheet

NIMS TRAINING GUIDELINES FOR FY 2006: IS-700, IS-800, ICS-100—400

| PERSONNEL  | REQUIRED TRAINING  |
|--|--|
| <p><b><i>Entry level first responders &amp; disaster workers</i></b></p> <p>Federal/State/Local/Tribal/Private Sector &amp; Non-governmental personnel to include:</p> <ul style="list-style-type: none"> <li>• Emergency Medical Service personnel</li> <li>• Firefighters</li> <li>• Hospital staff</li> <li>• Law Enforcement personnel</li> <li>• Public Health personnel</li> <li>• Public Works/Utility personnel</li> <li>• Skilled Support Personnel</li> <li>• Other emergency management response, support, volunteer personnel at all levels</li> </ul> | <ul style="list-style-type: none"> <li>• FEMA IS-700: NIMS, An Introduction</li> <li>• ICS-100: Introduction to ICS or equivalent</li> </ul>   |
| <p><b><i>First line supervisors</i></b></p> <p>Federal/State/Local/Tribal/Private Sector &amp; Non-governmental personnel to include:</p> <p>Single resource leaders, field supervisors, and other emergency management/response personnel that require a higher level of ICS/NIMS Training.</p>   | <ul style="list-style-type: none"> <li>• FEMA IS-700: NIMS, An Introduction</li> <li>• ICS-100: Introduction to ICS or equivalent</li> <li>• ICS-200: Basic ICS or equivalent</li> </ul>   |
| <p><b><i>Middle management</i></b></p> <p>Federal/State/Local/Tribal/Private Sector &amp; Non-governmental personnel to include:</p> <p>Strike team leaders, task force leaders, unit leaders, division/group supervisors, branch directors, and multi-agency coordination system/emergency operations center staff.</p>   | <ul style="list-style-type: none"> <li>• FEMA IS-700: NIMS, An Introduction</li> <li>• FEMA IS-800: National Response Plan (NRP), An Introduction*</li> <li>• ICS-100: Introduction to ICS or equivalent</li> <li>• ICS-200: Basic ICS or equivalent</li> <li>• <b><i>ICS-300: Intermediate ICS or equivalent (FY07 Requirement)</i></b></li> </ul>  |
| <p><b><i>Command and general staff</i></b></p> <p>Federal/State/Local/Tribal/Private Sector &amp; Non-governmental personnel to include:</p> <p>Select department heads with multi-agency coordination system responsibilities, area commanders, emergency managers, and multi-agency coordination system/emergency operations center managers.</p>  | <ul style="list-style-type: none"> <li>• FEMA IS-700: NIMS, An Introduction</li> <li>• FEMA IS-800: National Response Plan (NRP), An Introduction</li> <li>• ICS-100: Introduction to ICS or equivalent</li> <li>• ICS-200: Basic ICS or equivalent</li> <li>• <b><i>ICS-300: Intermediate ICS or equivalent (FY07 Requirement)</i></b></li> <li>• <b><i>ICS-400: Advanced ICS or equivalent (FY07 Requirement)</i></b></li> </ul> |



### 3. MORE CHALLENGING ASPECTS OF INCORPORATING NIMS INTO CSEPP

The steps discussed thus far for incorporating NIMS into CSEPP plans and procedures are rather straightforward. Now let's look at some issues that may be more problematic.



**Figure 3. The CSEPP Program in each community is designed to provide the optimal response to a potential release of known chemical compounds from specific storage areas or disposal facilities on the Army installation.**

NIMS applies a consistent approach to managing every incident regardless of the type of event that initiates it (whether it's natural disaster, industrial accident, or terrorist event) or its size (whether it affects a single building, a neighborhood, a city, or a region). In order to meet the needs of such a wide range of incidents, NIMS requirements are necessarily somewhat general. Each CSEPP community, on the other hand, has developed capabilities to respond to a

specific threat that emanates from a specific location. In CSEPP, many of the uncertainties that surround most emergency incidents have been eliminated through careful analysis of the hazard and the community. The remaining uncertainties have been defined and bounded so they can be dealt with efficiently at the time of an emergency.

It is important to incorporate NIMS into CSEPP in order to realize the benefits of a standardized approach to emergency management by all responding and supporting agencies and jurisdictions. However, it is crucial that the integration be accomplished in ways that preserve and even enhance the sophisticated capabilities that CSEPP communities have developed.

Fortunately, NIMS has foreseen the need for flexibility by stating, "Incident Commanders generally retain the flexibility to modify procedures or organizational structure to align as necessary with the operating characteristics of their specific jurisdictions or to accomplish the mission in the context of a particular hazard scenario" (U.S. Department of Homeland Security 2004, p 8). Thus, a CSEPP community could implement NIMS in special ways (such as those described in the following sections)

when responding to a chemical agent release from an Army installation, but still be free to use different approaches for managing other emergency situations.

### **3.1 UNIFIED COMMAND**

#### **3.1.1 The Issue**

One issue that will require creative thinking when integrating NIMS into CSEPP is that of Unified Command. NIMS calls for a Unified Command to be established to manage incidents requiring response from more than one agency or jurisdiction. A CSEPP community emergency will always fall into this category since both the Army installation and one or more off-post jurisdictions will be involved in the response. In many cases, multiple agencies from several local jurisdictions, one or more state governments, and various federal agencies will play roles in the response and recovery efforts. Any uncertainty regarding the applicability of NIMS to Army installations has been resolved by a memorandum from the Deputy Secretary of Defense directing DoD components to “adopt and implement procedures consistent with the NIMS and the Incident Command System . . . at all DoD domestic installations” (U.S. Department of Defense, 2005).

Under NIMS provisions for Unified Command, all agencies with jurisdictional authority or functional responsibility for the response, as well as those providing significant resource support, are to participate in a Unified Command structure. Cooperatively, they determine overall incident strategies; select objectives; ensure that joint planning for tactical activities is consistent with approved incident objectives; ensure the integration of tactical operations; and approve, commit, and make optimum use of all assigned resources. The Incident Action Plan is approved by the Unified Command, and a single Operations Section Chief directs the tactical implementation of the plan.

According to NIMS, this cooperative approach works best when participating members of the Unified Command co-locate at the Incident Command Post and observe the following practices:

- Select an Operations Section Chief for each operational period;
- Keep each other informed of specific requirements;
- Establish consolidated incident objectives, priorities, and strategies;
- Coordinate to establish a single system for ordering resources;
- Develop a consolidated IAP, written or oral, evaluated and updated at regular intervals; and
- Establish procedures for joint decision-making and documentation.



**Figure 4. Under CSEPP, off-post responders implement actions – such as decontaminating individuals who may have been exposed to chemical agent – to protect people and property in their communities.**

The approach developed under CSEPP for responding to chemical agent releases from an Army installation differs from the Unified Command model put forth by NIMS. In CSEPP, the Army installation is responsible for responding within its boundaries to contain and control the release and to protect people and property. The Army is also responsible for off-post monitoring to determine the concentration of agent in the air. The off-post jurisdictions affected by the release are responsible for implementing actions to protect people and property in their communities. CSEPP has developed sophisticated capabilities and requirements to ensure coordination and the exchange of information between on-post and off-post officials. Redundant, reliable data and voice communications links have been established to facilitate this information flow. In addition, the Army installation and the principal off-post

jurisdictions are required to send liaisons to each other's EOCs during the response to a chemical agent release.

There are several reasons that CSEPP calls for separate, but coordinated, on-post and off-post response efforts:

- Any release of chemical warfare agent on an Army installation will necessarily involve security considerations that limit the degree to which on-post and off-post response efforts can be integrated;
- Army personnel have the training and experience needed to deal directly with containing and controlling the release of extremely toxic chemical warfare agents;
- Since they work with the chemical agents on a routine basis, the Army personnel possess and are proficient in using the clothing and equipment that provides maximum protection from exposure to the agents;

- Local off-post responders are best able to implement response actions outside the installation because of their familiarity with the community's infrastructure, physical layout, and distribution of population and facilities;
- Because of the availability of highly trained military personnel, CSEPP has instituted a policy that off-post responders should not be deployed to areas where agent is known to be present in hazardous concentrations.

While the approach employed in CSEPP accomplishes a high level of coordination between the on-post and off-post response efforts, it does not directly meet NIMS requirements for a Unified Command. Army and community representatives do not meet at a single incident command post; they do not cooperatively develop a single Incident Action Plan; and they do not designate a single Operations Section Chief to implement the plan during each operational period.

### **3.1.2 Possible Solutions**

CSEPP planners must devise a way to resolve these differences if they are to successfully incorporate NIMS into their plans and procedures. Any reorganization of the emergency management structure must fit well with existing lines of authority and response practices and must respect the refined methods that have been developed under CSEPP. Any changes should be implemented carefully to ensure that the effectiveness of response is not compromised during the transition period.

Two possible ways of resolving this issue are outlined here; other approaches are also possible.

- Establish UC at the off-post ICP

One way to alter CSEPP to conform to the NIMS requirements would be to establish a Unified Command at the Incident Command Post of the principal off-post jurisdiction. The Army installation's liaison at this location would be its representative on the Unified Command. The liaison might require staff assistance to meet the position's increased responsibilities. CSEPP's advanced on-post/off-post communications links would augment the installation's ability to participate fully in the cooperative command structure.

The off-post Incident Command Post seems more appropriate as the location for the Unified Command than the Army installation command post because numerous supporting agencies and organizations, representing all levels of government and private concerns, will likely become involved as the response progresses. The local community's command post seems to be the most logical place to incorporate the participation of these groups; however, each CSEPP community should make this decision based on its own, unique situation. (As discussed in a later section, the off-post command post could be co-located with the local jurisdiction's emergency operations center.)

Working at the off-post ICP, participants in the Unified Command could develop an single overall Incident Action Plan incorporating both on-post and off-post components. A single Operations Section Chief could delegate authority for on-post response efforts to the Army Installation and off-post actions to civilian responders using NIMS provisions for dividing operations forces into geographic divisions or functional groups. When multiple jurisdictions and agencies form a Unified Command, it is crucial that all parties agree on the selection of a single Operations Section Chief and on the relationship between this position and the operational managers of the individual organizations.

While this approach to establishing a Unified Command is attractive conceptually, it may be impossible to implement within the specific constraints of CSEPP. Information security requirements associated with an on-post chemical agent release may present an insurmountable problem that severely limits the free flow of information among participants in the Unified Command and precludes the development of a single IAP incorporating both on-post and off-post response activities.

- Establish an Area Command

Another possible solution would be to allow the on-post and off-post response efforts to continue to be managed under separate command structures and to establish an Area Command to provide coordination between the two. NIMS provides for an Area Command to be established when necessary to oversee management of a very large incident involving multiple ICS organizations. While an incident involving a chemical agent release might or might not be “very large,” the response structure developed under CSEPP does support the concept of separate incident command organizations.

Under this approach representatives of the Army installation, the affected off-post jurisdictions, and resource support organizations would participate in the Area Command. NIMS does not stipulate that the Area Command must be established at a physical location. It might be possible to implement the concept using electronic communications and video conferencing to link participants stationed at separate locations.

According to NIMS, the Area Command would be responsible for:

- setting overall incident-related priorities;
- allocating critical resources according to priorities;
- ensuring that incidents are properly managed;
- ensuring that incident management objectives are met and do not conflict with each other or with agency policy;
- identifying critical resource needs and report them to EOCs and/or multiagency coordination entities; and

- ensuring that short-term emergency recovery is coordinated to assist in the transition to full recovery operations.

While this solution would add a new layer of management to the response strategy proposed by CSEPP, it would offer a means to avoid the information security problems inherent in a unified on-post/off-post command structure. By using the Area Command approach, on-post- and off-post response efforts could continue to be managed separately with coordination achieved through the Area Command. The CSEPP community at Umatilla Oregon, has developed an approach similar to this.

## **3.2 ICS DIRECTION OF INITIAL RESPONSE**

### **3.2.1 The Issue**

A central focus of NIMS is use of the Incident Command System to manage the response to any emergency incident. The ICS is typically initiated when a responder encounters an incident in the field or is sent to an incident by a 911 dispatcher. The responder or head of the responding unit assumes the role of Incident Commander. When a higher ranking person arrives at the incident, that person will either assume command, maintain command as is, or transfer command to a third party. An incident command post is established outside the present and potential hazard zone but close enough to the incident to maintain command. Operating out of this post, the Incident Commander manages the tactical response to the incident by building an incident management staff, developing plans to meet response objectives, and directing the actions of response forces.

Under NIMS, the Emergency Operations Center, or EOC, does not play a direct role in managing the tactical and operational response to the incident. Instead, the EOC supports the activities taking place at the Incident Command Post by providing coordination and resource supply functions. Depending on the complexity of the incident, an EOC may include representatives of multiple jurisdictions and functional disciplines. According to NIMS, the EOC performs the following functions:

- supports incident management policies and priorities established by the Incident Command;
- facilitates logistics support and resource tracking;
- informs resource allocation decisions using incident management priorities;
- coordinates incident-related information; and
- coordinates interagency and intergovernmental issues regarding incident management policies, priorities, and strategies.



**Figure 5. In CSEPP the EOC directs the tactical response to the incident in addition to providing resource support and coordinating with other agencies and jurisdictions.**

Emergency response plans developed under CSEPP have defined a much more active role for EOCs in managing the response to a release of chemical warfare agent from an Army installation. Under these plans the EOC directs the tactical response to the incident and also provides coordination and resource support functions. An ICS, if used at all, performs under the direction of the central management of the EOC.

The Incident Command concept was originally developed to guide the response to wildfires. A chemical warfare agent release from a military installation is a much more complex and technical situation, and a highly evolved response organization has been established to deal with it at each CSEPP site. This effective structure must not be degraded as ICS is integrated. On the other hand, the advantages of NIMS' uniform nationwide approach to emergency management should be achieved to the extent possible. Clearly, flexibility must be applied in integrating NIMS in this situation.

There are numerous reasons that CSEPP has vested control of the off-post response in the EOC:

- In contrast to most emergency situations which are detected when encountered in the field or when a citizen calls 911, the off-post community will most likely learn of a chemical agent release when the Army installation contacts the designated off-post notification point. In CSEPP, this centrally located point is either located in the EOC or has direct contact with the EOC.
- Much of the information needed to make critical incident management decisions will come from the Army installation through reliable, redundant communication links with the off-post EOC. The EOC has established procedures for obtaining needed information from other sources.

- Because of the extensive advance planning and analysis conducted by CSEPP communities, each off-post EOC has the equipment and procedures needed to deploy, support, and manage field response forces. These plans and procedures are tested in regularly scheduled exercises.
- The need for a command post near the incident site is reduced because, under CSEPP, off-post forces will not respond directly to the scene of the incident. Their role will be the protection of people and property in areas affected by the release through actions such as traffic control to expedite an evacuation. These activities will be dispersed throughout the community, not concentrated at the incident site.

### **3.2.2 Possible Solutions**

Clearly, CSEPP communities have solid reasons for relying on their EOCs to manage the response to possible releases of chemical agents from the Army installations. On the other hand, a CSEPP response will almost certainly involve multiple jurisdictions at various levels of government. These outside participants will arrive with the justifiable expectation that the response structure will conform to the incident command system mandated by NIMS. CSEPP communities must find ways to incorporate the ICS structure while maintaining their advanced centralized management capabilities. We will discuss two ways this could be accomplished. CSEPP community planners may find others.

- Co-locate the ICS and the EOC

The most obvious solution to this issue is to divide the existing EOC organizational structure of the principal off-post jurisdiction into two components: an incident command element and a supporting EOC element. The incident command element would be in charge of tactical management of the incident response, and the EOC element would be tasked with providing resource support and coordinating with other agencies and jurisdictions.

Existing CSEPP procedures for management of the response could be maintained most easily if both of these elements were located in the same facility. However, the two elements should be distinctly identified in order to realize the benefits of conforming to NIMS' consistent approach to incident management. Participants in the facility, whether representing the local jurisdiction or outside organizations, should have no doubt about who is directly managing the response and who is providing support. In addition, the incident command element should be appropriately isolated from incident support activities so they can focus on managing responders in the field. This is largely the approach adopted by Umatilla County, Oregon, which has integrated its field and EOC operations and located the Incident Commander being at the county EOC.



This approach could increase staffing requirements above the levels currently needed for EOC operations. In addition, some individuals may logically play roles in both the incident command element and the EOC element. Some existing EOC facilities may not lend themselves to dividing staff into two sections as described here. In these situations, either the concept would have to be tailored to the available facility or an additional facility would have to be obtained.

- Predesignate an IMT

Another possible solution is to follow NIMS provisions for designating an Incident Management Team, or IMT. This team would be activated in the event of a chemical warfare agent release from the Army installation and would consist of the command and general staff members of the ICS organization. By identifying such a team during the preparedness phase, a CSEPP community could revise its existing plans and procedures to separate incident command functions from EOC functions. Members of the IMT could receive the technical training needed to respond to a CSEPP incident and could be provided with appropriate equipment and facilities.

When activated, the IMT could be co-located with the EOC, as described in the previous solution, or could be housed at a separate facility. If the team were located at a separate facility, some communication and computer equipment would probably have to be transferred there from the EOC to support incident management operations. Co-location with the EOC would raise the same needs as discussed earlier for making a clear distinction between the IMT and EOC staff.

### **3.3 INCIDENT ACTION PLAN AS GUIDE FOR INITIAL RESPONSE**

#### **3.3.1 The Issue**

NIMS places great emphasis on the concept of management by objectives. One of the primary instruments put forth for implementing this concept is the Incident Action Plan, or IAP. The Incident Commander oversees the development of an IAP at the beginning of each operational time period during the incident. The plan specifies incident objectives and states the activities that are to be completed during that period. More specifically, the IAP answers four questions:

- What do we want to do?
- Who is responsible for doing it?
- How do we communicate with each other?
- What is the procedure if someone is injured or contaminated?

NIMS recognizes that the development of a definitive IAP will present a significant challenge at the beginning of an event. NIMS states, “during the initial stages of incident management, planners must develop a simple plan that can be communicated through concise oral briefings. Frequently, this plan

must be developed very quickly and with incomplete situation information” (U.S. Department of Homeland Security 2004, p. 97).

In planning for potential releases of chemical warfare agents from Army installations, CSEPP communities have confronted the possibility that these releases could reach off-post populations very quickly and produce serious health effects. This has led the communities to develop response plans to be implemented immediately when a chemical agent release is reported. These plans are geared primarily toward protecting the lives and health of people in areas affected by the release. The plans recognize that all information needed to decide what actions to take cannot be known beforehand. Thus the plans call for incident managers to obtain key information—such as wind direction and wind speed—at the time of the emergency and to use this information to decide among alternative response actions that are spelled out in the plan. The plans outline the organizational structures and identify the resources required to most effectively respond to a chemical agent release. In many cases, the Army installation and surrounding communities cooperatively develop a daily preliminary response plan based on the stockpile operations that will be performed that day. Off-post jurisdictions can adopt this daily operational plan and implementation cycle as the formal basis for the IAP.

### 3.3.2 Possible Solution

Planners in CSEPP communities can probably identify several ways to resolve this issue. One possibility would be for each jurisdiction to make a legal decision that, for incidents involving the release of chemical warfare agent from the Army installation, the Incident Commander would take the pre-developed CSEPP response plan, tailor it according to current conditions, and adopt it as the initial Incident Action Plan. This approach would conform to the sequential phases NIMS spells out for developing an IAP.

| <i>NIMS FIVE PHASES OF IAP DEVELOPMENT<br/>(U.S. Dept. of Homeland Security 2004, pp. 97-98)</i> |  |
|--|--|
| <i>First</i>   | <i>Understand the situation—gather, record, analyze, and display situation and resource information so as to present a clear picture of the magnitude, complexity, and potential impact of the incident and to ensure the ability to determine the resources required.</i> |
| <i>Second</i>  | <i>Establish incident objectives and strategy—formulate and prioritize incident objectives and identify an appropriate strategy; identify and evaluate alternative strategies.</i>   |
| <i>Third</i>   | <i>Develop the Plan—determine the tactical direction and the specific resource, reserves, and support requirements for implementing the selected strategy for one operational period.</i>  |
| <i>Fourth</i>  | <i>Prepare and disseminate the plan—format appropriate for the level of complexity of the incident.</i>  |
| <i>Fifth</i>   | <i>Evaluate and revise the plan.</i>   |

*NIMS SAMPLE IAP OUTLINE (U.S. Dept. of  
Homeland Security 2004, p. 22)*

*Common components*

*Incident Objectives*

*Organization list or chart*

*Assignment list*

*Communications plan*

*Logistics plan*

*Responder medical plan*

*Incident map*

*Health and safety plan*

*Other potential components (scenario  
dependent)*

*Air operations summary*

*Traffic plan*

*Decontamination Plan*

*Waste management or disposal plan*

*Demobilization plan*

*Operational medical plan*

*Evacuation plan*

*Site security plan*

*Investigative Plan*

*Evidence Recovery Plan*

*Other*

Under this possible solution, the first four phases would be largely accomplished during the preparedness period before a release occurred. The resulting plan could identify critical information that needed to be obtained at the time of the incident along with criteria that would enable the Incident Commander to evaluate that information quickly to complete the fifth phase of the process. Potential Incident Commanders and their staffs would need to be trained to implement this process expeditiously. CSEPP planners wishing to adopt this approach should consider revising their response plans using the IAP outline recommended by NIMS.

### **3.4 RELATION OF INCIDENT COMMAND PIO TO THE JIC**

#### **3.4.1 The Issue**

NIMS calls for the Incident Command Staff to include a Public Information Officer, or PIO. This officer handles media and public inquiries, emergency public information and warnings, rumor monitoring and response, and media monitoring. The PIO also performs other functions to coordinate, clear with appropriate authorities, and disseminate accurate and timely information related to the incident. The duties assigned to the PIO include functions that have historically been performed by a Joint Information Center, or JIC. While NIMS calls for the establishment of one or more JICs to handle public information concerns during an incident, it does not clearly spell out the relationship between the PIO and the JIC. For instance, it is not clear whether the PIO oversees the JIC or is, like the JIC, simply another node in the Joint Information System.



**Figure 6. Many CSEPP JICs have incorporated recent technological advances, such as wireless and web-based communications, to make JIC operations more effective.**

Communities involved in CSEPP have developed sophisticated capabilities for addressing public information needs during chemical agent emergencies. They have identified and prepared JIC facilities and trained public information representatives from the major agencies and jurisdictions expected to be involved in response efforts. Many CSEPP JICs have incorporated recent advances in communications technology, including wireless and web-based communications, to make JIC operations more effective. The personnel, procedures, and equipment of the JICs have been tested in exercises.

To ensure compliance with NIMS, CSEPP communities must clarify the relationship between the PIO and the Joint Information Center.

### **3.4.2 Possible Solution**

The CSEPP Public Affairs Integrated Process Team has put forth a design for a Joint Information System that addresses this issue very effectively. This system is described in a document entitled, *CSEPP Public Affairs Planning Guidance Compendium Workbook* in a section called “Model Joint Information Center.”

*THE CSEPP PUBLIC AFFAIRS PLANNING GUIDANCE COMPENDIUM WORKBOOK*  
IS AVAILABLE (REGISTRATION REQUIRED) AT  
<http://www.cseppportal.net/secure/category.aspx?q=17>

In this model system, the Lead PIO is charged with providing overall direction for the JIC and making policy decisions as well as advising the Incident Commander about public information strategies. The PIO should be the lead public information representative from the lead response agency.

Under the leadership of the Lead PIO the JIC would be organized into three groups:

- The Information Gathering and Production Group would be responsible for gathering information from the incident scene, EOCs, and the media; for monitoring the media to ensure the accuracy of reports; and for developing all information materials for use by the JIC.

- The Information Dissemination Group would keep the community informed through news conferences and briefings, interviews, news releases, fact sheets, website communications and telephone calls.
- The Field Operations Group would represent the JIC in the field. This group would provide face-to-face contact with the public, special interest groups, public officials and VIPs; support the media at high-profile sites in the field; and provide intelligence to the JIC about what is happening in the community by identifying information gaps, and reporting rumors and misinformation.

The Joint Information System recognizes that some participants may not be able to report to the JIC or that more than one JIC may be established. Thus, common resources and agreed-upon procedures allow participation through technological means when needed.

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#### **4. SUMMARY**

CSEPP planners face a variety of tasks as they work to incorporate NIMS into the program. Many of these tasks are fairly routine and mirror the steps that must be taken to revise general emergency operations plans and procedures to conform to the national standards. Other changes are unique to CSEPP and some require careful consideration by senior managers to ensure they do not degrade current CSEPP capabilities.

The effort to incorporate NIMS should be guided by two principles. First, planners should remember that a standardized national approach to emergency management will improve interagency and interjurisdictional coordination during incident response. Second, all participants at all levels should understand that, above all, every emergency incident should be met with the best response possible for that specific situation. Adherence to these principles will result in CSEPP response capabilities that are stronger than ever.

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## **5. REFERENCES**

U.S. Department of Homeland Security 2004, *National Incident Management System*, March 1, 2004.

U.S. Department of Defense, 2005, "Implementation of the National Response Plan and the National Incident Management System," (Memorandum from the Deputy Secretary of Defense to Secretaries of the Military Departments, Chairman of the Joint Chiefs of Staff, Under Secretaries of Defense, Assistant Secretaries of Defense, General Council of the Department of Defense, Inspector General of the Department of Defense, and Directors of Administration and Management, Defense Agencies, and DOD Field Agencies), November 29, 2005.