

LESSONS LEARNED, BEST PRACTICES, AND COMMON SENSE FROM U. S. GOVERNMENT-LED NATIONAL PREPAREDNESS FOR RESPONSE EXERCISE PROGRAM (PREP) DRILLS

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ABSTRACT

Professionals who design or participate in oil and hazardous material exercises would benefit from knowing historical lessons learned and best practices relative to the design and execution of exercises before they begin to develop or participate in similar exercises. In accordance with the "National Preparedness for Response Exercise Program (PREP) Guidelines" the staff at the USCG National Strike Force Coordination Center in Elizabeth City, NC has been in the business of designing, executing, and evaluating U.S. government-led PREP drills since 1993 and have accumulated abundant lessons learned and best practices relative to large scale exercises that would be beneficial to share with the response community. PREP exercises typically require six months to plan and design, three days to execute the drill with up to 300 participants, and three days to draft lessons learned. This paper will focus on lessons learned, problem areas, best practices, work arounds, and common sense pertaining to numerous subjects during the life cycle of designing and executing an exercise such as: Initial Design Phase; Functions of a Joint Design Team; Pre exercise Training; Play and Control Spaces; Communications; Incident Command System; Funding; Logistics; Notifications; Objectives; Public Affairs; and Improvements to Area Contingency Plans.

DISCUSSION

After the underlined and boldfaced subjects the lesson learned or best practice is described within the bulleted information.

Objectives

There are two different types of objectives: exercise design and responder objectives. Initially, months before the exercise, the primary participants (lead area, state, local, and industry contingency and response plan holders) must establish exercise design objectives, which a design team uses as guidance to develop and construct the exercise. Then, when the exercise begins, the incident commander or unified command (responders) must develop incident objectives.

- All objectives should be specific, measurable, achievable, realistic, and task oriented. An example of an exercise design objective: In lieu of "Exercise the Area Contingency Plan and selected Industry Response Plans, assessing the notification processes"; it is better to state "Exercise the Area Contingency Plan and selected Industry Response Plans, assessing

the notification processes to determine if all notifications are made per the response plans and if they are made in a timely manner (2 hours or less)". An example of a unified command objective: In lieu of "Identify environmentally sensitive areas"; it is better to state "Identify environmentally sensitive areas within the potential impact area by 1200 hours and conduct pre-impact beach cleanup."

Joint Design Team (JDT).

- Optimally, the JDT should be no more than 10 personnel (less is better). Representatives come from each primary participating organization. These include the lead agency, federal and state response agencies, lead local response agencies, and the responsible party(s).
- Each JDT member must have: authority to act on behalf of their agency, response experience, and a working knowledge of the policies and procedures of their organization and the objectives it wishes to exercise.
- Occasionally during the exercise design process, it becomes necessary to include additional agencies that can provide the JDT assistance in their area of expertise. These agencies, although not primary members of the JDT, provide substantial support and can influence the design of the exercise by adding greater realism and can be called in when they are needed.
- The lead plan holder needs to acquire early commitments from design team members to ensure that they will contribute to the planning process. Industry and government require a one-two year advance notice before the exercise, so that they can properly commit resources (budgetary and personnel planning).
- Include local emergency management agencies to ensure that they are incorporated into the exercise design and control processes.

Identify space for command post and control room.

- Begin no less than 3-4 months prior to an exercise to identify and inspect space needed for the command post and control room.
- Ensure you are dealing with the correct individual who has the authority to allocate and reserve your space. Visit and inspect the space in person. Does the command post meet your needs for square footage, i.e., based on the design of the exercise; can 50, 100, or 200 people work in the space? Is there adequate parking and electrical power and outlets?

- How many days do you need the space? Plan to give yourself enough time prior to the start of the exercise to clean and set up the spaces and time after the exercise to break down equipment for packing and shipping. All substantial set up efforts should be completed and finished 1 day before the exercise. Use the day before the exercise for minor adjustments, refinements, or corrections to your infrastructure needs such as phone lines, internet access, labeling, rearranging furniture, etc. Ensure the building manager knows in advance if you need access during the weekend or holiday to begin the set up process. Ask for 24-hour access to your space. Ideally you want a key to the space so that you have 24/7 access. If you can't get your own key, then the building owner/operator must open and secure the building to your desired operating hours (which could easily be before and after normal working hours).
- Immediately follow up your initial on site inspection with a confirmation letter to the building owner/operator specifying the dates the space is needed; the price to use the space; necessity for 24/7 access; parking arrangements; identify any furniture you saw during your survey that you want to use (conversely, specify that you need the space empty if you are bringing your own furniture); and clarify who is responsible to clean the space prior to your occupancy.

Phones and phone lines.

If the command post and control room space has no or minimal phone lines and the command post is for 200 participants, additional phone lines will need to be brought into the space. You need someone on your staff with telephone technical knowledge.

- At least 3 months prior to the exercise, a meeting must take place with the phone company technician, the building engineer, and an exercise representative who knows your phone line needs. There may be adequate phone lines already in the building but not being used or ones that can be rerouted to your space. An inspection of the building phone demarcation box is an essential starting point. PREP control room communications require 24 phone lines. I recommend the command post also have 24 phone lines. If you need more phone lines to be brought into the building, the telephone company technician will determine the feasibility and cost. At the conclusion of this site survey with the phone company technician, review and clarify what you want so the phone company can give you an accurate cost estimate.
- If your budget cannot fund the cost of bringing in additional phone lines to the command post and control room locations then you must search for alternative space with adequate existing phone lines to support your needs or seek alternative communications providers. Alternative communications providers can be an agency or organization volunteering a communication trailer, cell phones, tellular, microwave, or satellites.
- When the contracted work is to be performed in accordance with your statement of work, the best practice is to have your technician who originally did the site survey oversee the work to ensure the infrastructure is completed to your specifications.

Exercise set up Logistics Budget.

A pre-exercise logistics budget is primarily for costs associated with rental of the command post and control room, communications (phone lines, internet service, etc.), and travel/per diem for personnel that do the site surveys.

- Ensure your budget can fund last minute emergencies to purchase additional equipment or a trip back to the exercise

site prior to exercise week. As time passes, somewhere along what should be a successful chain of events to secure the building space and phone lines fails. Time is critical, if phone calls are not getting results, be prepared to go back on scene to remedy the situation. Also, when setting up the command post and control room, when critical equipment breaks or additional equipment is needed it will have to be purchased.

- During the pre-exercise set up, bring someone within your organization who has purchasing authority and or a credit card to purchase any critical last minute items.

Hotel Reservations for Exercise Week.

- Only make hotel reservations for personnel within your unit or organization whom you control. When you make reservations for personnel outside your organization, you risk alienating hotel management when the personnel outside your unit make changes and cancellations. When a block of rooms is set aside well ahead of exercise week, all individuals and organizations should have adequate time to make their own reservations prior to a cutoff date imposed by the hotel.
- You have significant leverage over a hotel when booking hundreds of hotel room nights. What does this mean? If your exercise brings in 100 people from out of town for 4 nights, that is 400 hotel room nights. You should shop between hotels that want your business. Go for the maximum hotel complimentary benefits: made to order breakfasts, nightly cocktails with appetizers, free parking, etc.

Number of Participants.

There are often too many people at an exercise; this increases spending and adds little value to the exercise objectives. Too many participants interfere with the command, control, and communications capabilities.

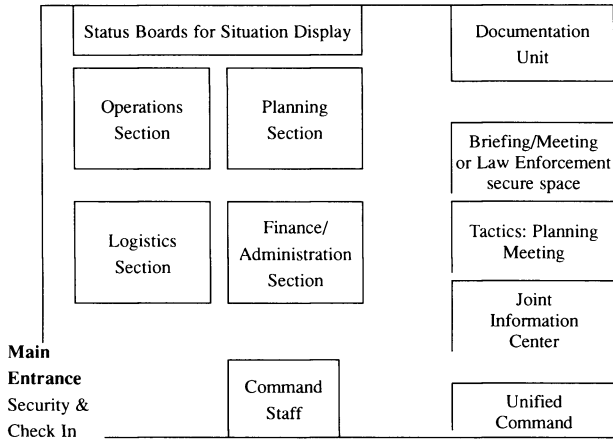
- The number and inclusion of players should be based on the response plans and tier (local, regional, or national) being exercised and objectives developed by the design team. The design team can control who should participate in the exercise by identifying the number each organization brings. Players should be limited to responders and those that are in training (shadow their mentor). Observers should be separate from the actual players since their presence may distract the players.

Command Post Design.

There is no standard on how to set up a command post.

- Security should be established outside of the command post to challenge anyone who wants entry. Participants should have exercise identification badges. Use different color badges for player (responder), observer, and control staff.
- Operations and Planning should be located side by side and be able to see the situation unit displays/status boards.
- Unified Command needs the most isolated/quite space for their discussions.
- The JIC should be close to the Unified Command with at least 4 phones and 1 fax.
- Have a briefing/meeting area capable of supporting planning meetings and Command and General staff briefings.
- Have a media/VIP briefing area that is separate from Command and General Staff spaces and supports access control into those spaces.

• Proposed Command Post Design:



Pre Exercise Training.

Effective pre exercise training for the PREP exercise can cover a six-month period. Training and mini-exercises are effective when delivered in a specific order for maximum effectiveness.

- a) Incident Command System(ICS) 200/300 training;
- b) Incident Response Planning Workshop (skills based ICS training);
- c) Table Top Exercise (focused on a specific aspect such as a terrorist caused oil spill);
- d) Multi-Agency Team-building Enhancement System (ICS team training);
- e) Shoreline Clean-up Assessment Training;
- f) Recall exercise;
- g) Joint Information Center and Risk Communications training;
- h) Player Orientation and Exercise Rules;
- i) Communications Equipment Training.
- The Incident Command System training should be attended by the agencies and organizations that will be participating in the PREP exercise. This type of inter-agency training will build both common incident management skills and personal relations with other responders.
- Those designated to fill key ICS Command (Operations Section Chief and Planning Section Chief) and General Staff positions and Unit Leader positions (Situation Unit Leader, Resource Unit Leader), should have position specific training.

Pre Exercise PREP Press Release.

- It is a good idea to tell the local community of the positive events that the response community has pursued by planning and participating in the exercise by sending an exercise press release about 1 week before the event. Emphasize:
 - Large-scale exercises enhance prevention of spills and mitigation should a spill occur through preparedness.
 - Communities exercise to assess their preparedness to respond to oil spills and chemical releases.
 - Participants support the National Response System and Homeland Security by minimizing the adverse impact to the public and reducing environmental damage from oil discharges and hazardous substance releases.

Telecommunications support.

Generally, the telecommunications effort is an integrated effort with support from various Coast Guard and commercial sources, resulting in near-seamless communications. Player-representation in the Communications Unit usually has Coast Guard and industry representation.

- Telecommunications support can be provided by the following sources: Coast Guard Communications Assist Team

which can provide the Transportable Communications Center for communications between a waterborne security force and the command post; Nextel’s Emergency Response Team, which can provide 50 loaner Nextel units and technical support for communications interoperability; Commercial high-speed internet access for Remote Access to the Coast Guard Data Network and internet access for the other participants.

Incident Command System Technical Specialists.

- ICS Technical Specialists working for the response organization can make recommendations to improve processes, enhance coordination among the Unified Command, Command Staff, General Staff and Unit Leaders, and coach individuals on their specific job responsibilities. This can result in the multi-agency response organization work together more efficiently and effectively.

Notifications.

- Recently, scenarios usually include factors that require law enforcement elements to be notified (State Homeland Security Offices, FBI, and local and state law enforcement elements). Ensure these law enforcement contact numbers are in the Area Contingency Plan.
- Notifications to assisting and cooperating agencies (i.e. natural resource trustees, State Historic Preservation Officer) may not occur either due to exercises beginning outside normal working hours or the contingency plan needs to include them.
- The Department of Interior is the point of contact for US Fish & Wildlife representation as well as possible archeologist, tribal contacts, and trusteeship. They should be contacted early in the notification process. National Oceanic and Atmospheric Administration and state trustee representatives should likewise be notified so that natural resource damage assessment may commence along with the emergency response.
- Initial notifications that primarily state an incident has occurred needs to be followed up to clarify when and where a unified command is going to be stood up.

Planning Section.

The Planning Section normally struggles to get ahead of the incident and be proactive. This is to be expected during the early stages of any incident, but if the planning section does not become proactive a chronic problem results through the duration of the exercise.

- The Planning Section can be slow to dispatch Shoreline Clean-up Assessment Teams (SCAT), engage the states in development of disposal and decontamination plans, and creating an integrated Environmental Unit that has representation from all stakeholders. As a result, the Planning Section will be severely hampered in its’ ability to effectively support the response.
- Planning Section Chiefs and Unit Leaders must be well trained in both their ICS position and in the unique aspects of oil spill response operations.
- Include in the Area Contingency Plan (ACP) examples of: a) Decontamination plan; b) Disposal plan (including use of decanting); c) Demobilization plan; d) Job aides that guide the user through the deployment of SCATs including the appropriate forms SCATs need to use to capture their findings.

Situation Unit.

A well-executed Situation Unit is central to the ICS planning process and support of all incident personnel. An ineffective

Situation Unit is unable to support the Operations Section and Planning Section in the development of the Incident Action Plan.

- The Situation Unit must be able to capture and display the current and future incident situation. At a minimum the situation display should show: a) geographic divisions; b) location of boom; c) security zones; d) staging areas; e) Incident Command Post; f) location of the oil impact; g) sensitive areas; h) projected location of oil movement; i) weather; j) tides and currents; k) map symbology.
- A good situation display provides the timely information necessary for the Operations Section to execute its responsibilities. Another critical responsibility of the Situation Unit is the dissemination of information throughout the command team. From the Unified Commanders to Division Supervisors the Situation Unit provides the information flow necessary to ensure that everyone on the incident has accurate situational information.
- Situation Unit Leaders need to receive position training to ensure that they have the skills and appreciation to carryout their responsibilities.

Law Enforcement (LE) agencies integrated into the ICS system.

As exercise scenarios develop which include terrorism as a factor, the local and state police and Federal Bureau of Investigation must work together to prosecute potential crime scenes and investigate leads.

- Law enforcement elements should be represented in the Unified Command of the ICS.
- Evidence and intelligence gathered by local, state, and federal law enforcement agencies that prosecute potential crime scenes that results in a release of oil or hazardous material into the marine environment should be shared with the appropriate Coast Guard maritime law enforcement elements. This allows for protection of the responders and for response activities to be modified to appropriately account for the risk of a secondary or follow-on incident. The information that the LE representatives share must be considered and included in determining follow-on response actions. Further, in response to a terrorist incident resulting in a spill, there will likely be a follow-on law enforcement response, such as a security zone or perhaps an increase in Maritime Security level. This must be coordinated with the environmental response to assure public and responder safety.
- The Operations Section should be set up to support the LE aspect of the response. This can be accomplished with a Deputy Operations Section Chief (OSC) for Maritime Law Enforcement (MLE) and a Deputy Operations Section Chief for Spill Response. The Deputy OSC for MLE manages the waterside law enforcement response and the Deputy OSC for Spill Response manages the oil spill response. The OSC is responsible for much of the operations planning and for ensuring that the LE response and spill response are a coordinated effort.

Law Enforcement (LE) in the Operations Section can be divided into LE Operations Group and LE Investigations Group.

The law enforcement activities for a terrorism induced spill response generally include investigations and operations.

- The LE activities can be managed by one LE Group in the Operations Section. This can be more effective if it is further broken down into an LE Operations Group and

an LE Investigations Group. The LE Operations Group can focus on maintaining a waterside and shore side law enforcement presence, enforcing security zones, and checking the credentials to verify the identity of responders. The LE Investigations Group can focus continuing investigations of crime scenes, intelligence gathering and investigation of leads.

- Ideally, both these groups would report to the Deputy Operations Section Chief for Maritime Law Enforcement and if the investigations were coordinated on land only, the LE Investigations Group would report directly to the Operations Section Chief.

Law Enforcement (LE) personnel need a separate, secure area.

LE representatives in the unified command need their own secure room/space for communications inside of the command post to discuss, analyze, and pass sensitive information.

- Communications equipment that allows for direct and timely communication with the LE afloat assets on the water should be available. A secure phone line should also be available for their use.
- The USCG Communication Area Master Station Atlantic (CAMSLANT) communications trailer is a viable tool to provide secure communications.

Joint Information Center.

A big challenge during a major response will be to provide timely information to the media and public. This challenge can be increased with terrorism as an element of the scenario as well as a large number of Incident Commanders (IC) comprising the Unified Command. A bottleneck in information flow can be experienced in obtaining approval from IC's before releasing information to the public/media.

- With more than three IC's (Coast Guard, responsible party, and state), getting the collective attention of all IC's to approve information release on a case-by-case basis has proved a major challenge. To help alleviate this, IC's should agree to give the Information Officer (IO) release authority for information related to oil spill and clean-up operations, while any information relating to terrorism or law enforcement response/investigative actions should first be cleared through IC's.
- Familiarity with National Response Team JIC Manual and Incident Management Handbook are key: JIC model/positions, interactions with other response positions within ICS structure, and role in the Incident Command System (ICS) Planning Process.
- As soon as possible send out an initial press release with basic information, provide point of contact information, and establish a dedicated line for the media to call in on.
- Establish /obtain from IC's basic release authority for categories of information—what types of info does IO/JIC have authority to release on own; what type of information must first be cleared through Unified Command.
- In standing up the JIC be inclusive as possible among involved agencies & organizations—this taps into the broad experience base of all participants, provides unique prospective and concerns of each agency and organization represented.
- Since the IO is a member of Command Staff—quickly appoint a JIC Manager (Asst IO) to handle details of JIC, this allows IO to stay engaged with IC's.

Internet access for response personnel.

- Internet access should be available to all command post personnel. Individuals can do research, access data and information, send data and digital pictures, access agency email capabilities, etc. Its use is limited to the ability, knowledge and imagination of the individual.
- Have accessible broadband wire/wireless networks installed and functional at the earliest possible time during an event and have it designed to be able to expand in scope as the incident increases in size. Currently, broadband services are widely available and local wireless networks are becoming widely used in both industry and government. Wireless networks allow many users to safely share the same broadband Internet connection. Wireless networks are now inexpensive, fast, and extremely easy to install and setup. Cryptic security protocols can easily be established to enable both open and secure networks within the same work-area to provide transmission of both open and secure data to response personnel.

Occupational Safety and Health Administration (OSHA) representative as an Assistant Safety Officer.

- The use of an OSHA representative as an assistant Safety Officer can be effective to identify, address, and mitigate safety hazards within the response organization. The individual should attend the pre exercise Multi-Agency

Team-building Enhancement System training conducted for Command and General Staff. During the exercise, the same individual will not be in the role of a regulator but contributing as part of the solution to identify, address, and mitigate safety hazards within the response organization.

REFERENCES

National Preparedness for Response Exercise Program (PREP) Guidelines, August 2002

Coast Guard Standard After Action Information and Lessons Learned System (<http://138.145.28.13/default.htm>)

BIOGRAPHY

Dennis Cashman has been an exercise team leader assigned to the National Strike Force Coordination Center in Elizabeth City, NC since 1995 involved in designing, executing, and evaluating over 50 government-led area exercises. He is a 1974 graduate of the US Merchant Marine Academy and has a master's degree in education from Old Dominion University.

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