

Incident Management Preparedness Advisors - from Concept to Reality and Beyond

CAPT Anthony Lloyd

Chief, D5 Office of Planning & Force Readiness

United States Coast Guard

Portsmouth, VA., USA

Mr. David Ormes

D5 Incident Management & Preparedness Advisor

United States Coast Guard

Portsmouth, VA., USA

This paper and any attachments contain the opinions of the authors. The information contained in this paper is intended solely for the use of the entities to which the paper is addressed. The opinions are not official policy, or official interpretations of policy, but rather statements intended to garner discussion, improvements, open dialogue and innovation.

Abstract

Coast Guard Incident Management Preparedness Advisors, or IMPA's, have existed now for nearly five years. Have they lived up to their original billing or have they missed the mark? Was the original concept for IMPAs properly implemented? Today's complex response and planning environment and governance structure provides ample justification for IMPAs and their work but challenges in implementation continue. The authors will review the original concept and discuss how IMPA implementation is understood both within the Coast Guard, and the interagency amongst partners and the private sector. Actual IMPA experiences and observations will be reviewed to identify gaps and suggest ways to leverage this important resource. Other preparedness advisor efforts will be compared to the current CG effort to suggest, or confirm, best practices.

The National Contingency Plan envisions a robust preparedness program which is detailed in the Preparedness for Response (PREP) guidelines. The focus on preparedness, however, often is overshadowed by day-to-day concerns and all too often slides down the list of priorities without an "active" and forward leaning approach. IMPAs are conceptually intended to take this "active" approach in hopes of stabilizing preparedness initiatives, across all hazards, for the Coast Guard. IMPAs have had success nationally for the CG and continue to steward deeper improvements in preparedness, certainly as it relates to the NCP. They must also focus on the National Response Framework (NRF) which encompasses the NCP structure within Emergency Support Function 10 and utilizes many of the same concepts to support preparing for the use of response management systems. The IMPA's must interact with FEMA via the Regional Incident Steering Committee (RISC) and have an understanding of the impacts

of the recently National Frameworks. The authors' recommendations will highlight strengths to the IMPA concept and suggest ways to positively lever IMPA support within a particular region. Additionally, a recommended list of IMPA common responsibilities will be proposed to further standardize IMPA efforts nationally.

Introduction

Coast Guard responsibilities are clear in the National Contingency Plan (NCP) whereby local Coast Guard Commanding Officer fulfills the role of the Federal On-Scene Coordinator (FOOSC) and the Coast Guard District office in the respective Sector chain of command serves as the Chair of the Regional Response Team (RRT). RRTs are responsible for regional planning and preparedness activities before response actions, and for providing advice and support to the OSC or RPM when activated during a response.

RRT membership consists of designated representatives from each federal agency that is a party to the National Contingency Plan (NCP) together with states and (as agreed upon by the states) local government representatives (NCP, 1990). This “shared” preparedness is a foundational concept within the NCP. Within the Coast Guard units are directed in current policy and guidance to continually work to reduce the negative impacts during an incidents “crisis phase” with robust local and regional plans and an energetic meeting and exercise cycle to test and maintain them. (USCG Pub 3-28, 2014) This has been the Coast Guard’s aim for many years to act collectively with our partners in every port and region of the country maintaining positive preparedness and relationships in support of the NCP. The Department of Homeland Security (DHS) released the initial version of the National Response Framework (NRF) in 2008. The NRF succeeded the National Response Plan (NRP) after Hurricane Katrina struck the U.S

Gulf . NRP challenges deriving from Hurricane Katrina led Congress to enact the Post-Katrina Management Reform Act. (P.L. 109295). The NRF established revised guidance for coordinating federal and nonfederal resources and entities. Within this construct, the NCP resides within the NRF, connecting through Emergency Support Function (ESF) 10. This expanded the Coast Guard’s preparedness efforts as the entire Federal enterprise is party to the NRF, whereas 16 Federal agencies comprise the NCP. In short, Coast Guard preparedness efforts became broader and deeper as the NRF’s “all hazards” approach overlaid NCP constructs.

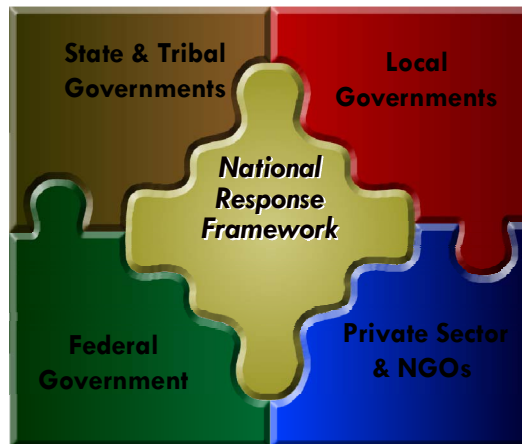
It follows then, as the Lead Federal Agency for Maritime preparedness and Response, that Coast Guard strategy be expanded ensuring better coverage of America’s maritime safety, security and stewardship in the complex Maritime Transportation system (MTS). Our preparedness efforts are locally promoted by Coast Guard Sectors using their broad array of authorities as we work with many stakeholders. Just as significantly is the preparedness challenge at the regional level through our Coast Guard Districts to also achieve better preparedness on the variety of plans at that level. Efforts to test and maintain healthy relationships with agencies and states are mandate from the NRF to ensure mechanisms linking preparedness activities of individual agencies and organizations across the country, foster a culture of cooperation and coordination.

Background – Adapting Guidance

Against this backdrop, the Coast Guard was challenged to align with the NRF. This was critical given the mandate found in Homeland Security Presidential Directive 5 to align Coast Guard incident management efforts and preparation for response to all-incidents/all-hazards using the National Incident Management System (NIMS). This

alignment and implementation required extensive revisions to key policy and doctrine. The Coast Guard's Contingency Planning and Preparedness manual (CPPM) volume 4 and Doctrine publication 3-28, Incident Management and Crisis Response, have recently been released to ensure the Coast Guard is fully consistent in the execution and alignment of our missions to the NRF when necessary. The policy and doctrine now guides Coast Guard efforts to establish and maintain a broad array of stakeholder relationships. These relationships are critical for assuring alignment of our longstanding responsibilities in the National Contingency Plan (NCP) as well. For this plan, local Coast Guard Commanding Officers fulfill the role of the Federal on Scene Coordinator (FOSC) and the Coast Guard District office in the respective Sector chain of command serves as the Chair of the Regional Response Team (RRT). The interlocking arrangement of relationships and organizations is the nation's primary strategy for incident preparedness and response.

Unified national response and preparedness requires mutually supporting stakeholders



(Figure 1)

The Role of the District

Coast Guard Districts exercise a measure of span of control and are in the chain of command to provide support and accountability to field units within their respective geographic areas. District Commanders facilitate and prioritize Sector requests for a variety of additional resources. Further, Districts support preparedness and exercise efforts, command, control, while also obtaining a broad range of support. Districts are also responsible for representing Coast Guard equities and interests in both planning and response in regional, Tribal, State, Federal and private sector planning communities. In that regard, District boundary lines do not align with the ten Federal FEMA Regions making collaboration all the more difficult (Figure 2). To account for the importance of this as the NRF rolled out Coast Guard guidance was developed tasking Districts to maintain active participation in groups such as the FEMA Regional Interagency Steering Committees (RISCs) ... [and] ... each Regional Response Team (RRT) within their jurisdiction, [ensuring each] is appropriately led by a senior officer, acting as the RRT Co Chair with the Environmental Protection Agency (EPA). This tasking was specifically placed into guidance in 2009. (COMDINST 16000.22, 2009) That guidance, now superseded by CPPM volume 4, was created recognizing the importance of stakeholder collaboration and alignment of external relationships with Coast Guard regional planning efforts. The change envisioned these efforts occurring within NRF structures in support of the new national guidance at the time challenging Districts to maintain these relationships.

FEMA Regions vs. USCG Districts

**The Crucible – Deepwater Horizon**

IMPAs did not exist in 2010. The functions they are responsible for were previously under the purview of a District Division officer. Typically the Division responsible for coordination with NCP and NRF structures was a Coast Guard Captain or Commander. Usually the tasks were covered on a collateral duty basis. The updated tasking requiring the connection with NRF structures had been released prior to Deepwater Horizon but the findings of the Incident Specific Preparedness review (ISPR) for Deepwater Horizon identified gaps indicating further areas for improvement. The below table summarizes the ISPR findings. The RRT primarily responsible for overseeing the Deepwater Response was effective and played the role envisioned by the NCP as it relates to dispersants and alternative response technologies. The RRT was bypassed by the EPA Administrator in an effort to react to the misperceptions surrounding dispersant use on the spill (Final Action Memo, ISPR, 2011). While this wasn't casual to the recommendation for implementing the IMPA concept the idea of a

stationary senior official, at Coast Guard Districts, was seen at the time as a way to ensure further attempts to respond outside of both NCP and NRF constructs could be mitigated (Author’s recollection, 2010).

Deepwater Horizon ISPR Lessons Learned – Issues related to community planning and preparedness
Oversight of Area Committees should be standardized and reviewed by Districts or other program managers.
Coast Guard Districts and Regional Response Teams(RRTs) should regularly participate in ACP review and approval to maintain consistency and effectiveness of plans for their particular geographic areas.
The lack of oversight from Regional Response Teams (RRTs) and Coast Guard Districts contributed to significant variability among ACPs with regard to ESAs in the Gulf region.
The Coast Guard’s Areas and Districts should be more involved in the contingency planning process to ensure high-quality regional plans that encompass coastal regions.
Contingency planning at some Coast Guard Sectors and other levels of the Coast Guard Districts has not been emphasized in recent years, resulting in inadequate preparedness for large-scale events.

Underlying these findings was the fact that at the District level, turnover of personnel was impacting and potentially destabilizing preparedness. The standing leadership at RRTs would change every two or three years with some shorter stints due to

retirements or reassignments. Preparedness gaps would be closed intermittently only to lag when new observations needed implementation. The gaps identified in the ISPR reflected a measure of responsibility that hadn't necessarily been covered uniformly by the Districts in the past. The maintenance of healthy interagency relationships at the district level was scrutinized and the findings provided an impetus to apply post spill resources to the novel concept of an Incident Management Preparedness Advisors (IMPA) with the desire to close preparedness gaps.

Incident Management Preparedness Advisors (IMPA)

Changes resulting in the NRF and post spill observations placed more pressure on District staffs to conduct coordination of Coast Guard operational and planning activities at the regional level. IMPA's have been placed at each of the nine Coast Guard District offices to fulfill these roles. The effectiveness of inter-agency relationships as well as the training and policy oversight of Sectors are reinforced by long-term stability and familiarity of stakeholders within the Coast Guard District staff. In this regard, the IMPA is now key. The IMPA primarily serves as the CG RRT Co-chair and the District representative to the FEMA Regional Interagency Steering Committee (RISC). IMPAs are civilian positions and leading experts on Coast Guard operations and connectivity under the NCP and NRF. They serve as a vital link between the District and the RISC, as a deployable resource coordinator, and as a technical advisor to the District Commander. IMPAs do not transfer out of Districts/Regions but rather develop stable, longstanding relationships. The real return on investment in time and leadership occurs over time as efforts to integrate Coast Guard Plans with regional intergovernmental plans take place. IMPAs ensure the preparedness cycle of planning, training, exercising, evaluating, and

revising is continually implemented to make steady improvements in District response capacities and plans (USCG Pub 3-28, 2014). The below summary highlights the assigned priority tasks for Coast Guard IMPAs:

IMPA PRIORITY TASKS

National Oil and Hazardous Substances Pollution Contingency Plan

- Serve as the co-chair for Regional Response Team (RRT);
- Direct planning for and support of District level response to discharges of oil and/or hazardous substances and maritime emergencies or natural disasters in the area of responsibility that exceed local planning mid response capabilities;
- Coordinate with the District Response Advisory Team (DRAT) for the execution of their activities;

National Response Framework

- Serve as the District's primary representative to the FEMA Regional Interagency Steering Committee(s) (RISCs);
- Coordinate the District's liaison function with appropriate state Emergency Managers;
- Direct planning and support of District level response to major regional or national NRF incidents;
- Serve as the Districts coordinator and subject matter expert for FEMA Mission Assignment policy, implementation and assignment process;
- Direct the organization and execution of the Emergency Support Function (ESF) concept within the NRF and coordinate relevant Coast Guard participation as appropriate;
- Coordinate training, activations and support by Emergency Preparedness Liaison Officer (EPLO)

Finally, in 2012 a survey of Atlantic Area IMPAs was conducted to look at, among other things, what is working and what are the challenges. In that study State relationship, exercise and IMT support were strengths whereas bench strength was a primary challenge.¹ So the question regarding satisfactory implementation can be positively answered and it's fair to say that the current state of IMPA implementation

¹ The study was conducted by one district and covered a range of preparedness and response issues. Many similarities existed, enough to anecdotally conclude IMPA efforts were similar and robust early on.

within the Coast Guard is well understood.

Regional Inter-agency relationships and preparedness efforts

In the Fifth District the IMPA has engaged in numerous initiatives to enhance interaction and understanding with RISC partners by increasing interaction given that the Federal role emphasizes leaning forward to provide support to states, tribes, and locals as well as assuring situational awareness when those entities are overwhelmed and in need of additional support. With the continued support of the District Commander, the IMPA was able to reaffirm the Coast Guard's commitment to long standing collaboration with FEMA Region III in ensuring Mid-Atlantic preparedness to prevent, protect against, respond to, recover from, and mitigate any event that threatens adverse impacts on the US and its citizens. Due to Coast Guard authorities, responsibilities, and location of field units, the CG is unique among the federal family in that as a federal entity we are part of the local response community for All Hazards.

Our units work side by side with the local and state and tribal public safety and emergency response personnel, regardless of incident size or complexity. In the past five years, the Coast Guard District Five responded locally and regionally to 17 named tropical storms and 7 hurricanes, including 2 major hurricanes and several severe floods and earthquakes. Historical cases include several security special events including Homeland Security Special Events in Baltimore and Washington D.C. Over 13 Mission Assignments issued to D5 from FEMA Regions II, III and IV totaling \$472,000 have been issued in the past several years.

In April, 2016 FEMA III reps participated in our annual D5 Functional Hurrex to support Mission Assignment collaboration. During Hurricane Matthew the IMPA

International Oil Spill Conference

coordinated an ESF 10 mission assignment for \$100,000.00 to support response incidents in Sector North Carolina. For Area Contingency plans the IMPA led a complete revision of all environmentally sensitive areas (ESI) in the Mid-Atlantic, while coordinating the revisions with state and local responders and resource managers. The enormous amount of data improvements to ESI's required District support, and funds, and personnel to complete. The effort directly addressed the ISPR findings, albeit for the Mid-Atlantic region.

The Aircraft coordination for Hurricane Matthew went very well and information flow and management was coordinated and deconflicted smartly. For 2016 D5 staff helped support a Mid-Atlantic Aviation Forum, sponsored by the D5 Command Center. The forum contained both a seminar and TTX type event and was held early on in the hurricane season, in the Hampton Roads area. The primary focus of the forum was integrating aircraft operations with landside emergency response for mass rescue events. The forum site was the Military Aviation Museum in Virginia Beach, and had the capability for federal, state, local, and private agencies / organizations to fly in to participate. While the event was held in Hampton Roads, issues addressed and participating stakeholders drew from a regional perspective.

Concurrent with planning for this event, the D5 IMPA staff updated the D5 Mass Rescue Operations planning guidance, which needed a significant revision. While the forum's focus was on MRO the relationships built enhanced Hurricane and flooding response for the 2016 Hurricane season.

Future Plans and Focus Areas

Outreach and preparedness efforts with FEMA continue to focus on process

International Oil Spill Conference

awareness, job assignments, and likely scenarios for deployment. Also, the CG role in ESF 9 is ripe for continued CG and FEMA collaboration as all seek to understand and work closely with State and FEMA Urban Search and Rescue expertise which can integrate with USCG waterborne SAR capabilities. CG and FEMA continue to learn about the need for CG SAR expertise to be present when supporting FEMA staffs for flooding events. The work during the 2016 Hurrex positively contributed to response efforts this year. We continue taking steps to ensure that awareness and understanding improves for the 2017 Hurricane season. Typically IMPAs assess, on an on-going basis, relationships, gaps, etc. to help implement and validate system enhancements. Potential focus areas to consider include:

- Port Recovery information management
- Pre-scripted mission assignments (PSMAs)
- Exercise Coordination
- Aviation support to exercises and Airspace Management
- Activities within the National Capital Region (NCR)
- Support to Congressional and media outreach

Continuing emphasis on the need for the preparation and rapid deployment of these assignments for the foreseeable future. CG D5 will be encouraging D5 field units to discuss the PSMAs with state emergency managers to ensure their interaction focuses on practical solutions that have been vetted as the best resources for OGA and state requests.

Maritime Transportation System disruptions are another important focus topic. Because Response/Recovery within the Port Environment is very complex understanding how both FEMA Region III and USCG D5 will support/lead port recovery is a critical

planning task moving forward. Working collaboratively at all levels through RRTs and the RISC has increased cooperation with FEMA and the rest of the federal interagency. Maritime transportation system response and recovery (MTSRU) Port Recovery is notionally an ESF 1 function whereby CG support and information is transmitted to FEMA, Department of Transportation, Army Corp, and other agencies. Because the port environment has changed drastically over the last decade the scale and complexity of impacts from large events require unity of effort across an even broader spectrum of stakeholders to resolve. This effort will occur typically within the local Coast Guard unit but at the regional level liaisons and information management assistance can leverage the complexity of incident and event management placing the IMPA in an excellent position to support efforts as the staffing needs of the incident dictate.

Conclusions

The National Response Framework and the National Contingency Plan envisions a robust preparedness program to reduce risk for minor, and major incidents. IMPAs are critical to the maintenance of healthy interagency relationships at the regional level which is a task often easily overlooked and often easier still to oversimplify. The authors have presented a summary of IMPA concepts in the hopes that preparedness stabilizes in the out years as effective implementation of preparedness improvements accrue nationally for the CG. The plans, exercises, and interaction necessary as a result of NCP and NRF requirements are opportunities to improve and maintain stable relationships with a complex mixture of state, local, and federal stakeholders. IMPAs have a key role in aligning the NCP into the larger system of preparedness. Their leadership in keeping relationships healthy and well maintained is not only a worthier endeavor but an

excellent strategy to accrue better preparedness and response results over time.

Summary

The key to preparedness is maintaining healthy relationships and the key to response success is early integration of efforts derived from strong planning and those very relationships. This “shared” preparedness is a foundational concept within the NRF and the NCP. Within these plans Coast Guard personnel and units, coordinated by Coast Guard IMPAs, continually work to reduce negative impacts during the “crisis phase” of incidents and events. By holding as a high priority the interagency leadership of Coast Guard IMPAs, the inter-agency has developed a robust foundation and an energetic meeting and exercise cycle to maintain it. This has been the Coast Guard’s aim for many years to act collectively with our partners in every port and region of the country. Limited resources and difficulties in the past posed substantial challenges for the Coast Guard. With IMPAs serving the Coast Guard’s lead coordinators of response and preparedness expertise, the Coast Guard, with support from a broad mix of stakeholders, anticipates better response effectiveness moving forward.

References

International Oil Spill Conference

1. U.S. Coast Guard Publication, 2014, Publication 3-28, Incident Management and Crisis Response, 2014.
2. Public Law 101-380, August 18, 1990 as amended by PL 102-239, October 6, 1992. (H.R. 1465-42,) Oil Pollution Act of 1990, 33 CFR § 300.150(c)(2) and § 300.115.
3. U.S. Coast Guard, 2011, Final Action Memo - Incident Specific Preparedness Review (ISPR) Deepwater Horizon Oil Spill, 18 March 2011.
4. U.S. Coast Guard Instruction, 2009, Commandant Instruction 3025.1, Emergency Preparedness Liaison Officer (EPLO) Program, 2009.

Bibliography

U.S. Coast Guard, 2008, Commandant Instruction 16465.41A, District Response Groups/District Response Advisory Teams.

U.S. Coast Guard, 2016, National Response Team (NRT) Guidelines, 2016 National Preparedness for Response Exercise Program (PREP) Guidelines.

U.S. Coast Guard Instruction, 2015, Commandant Instruction M3010.11D, Contingency Preparedness Planning Manual, Volume 4: Contingency Planning Policy, 2015.

Federal Emergency Management Agency (FEMA), 2016, National Response Framework, Third Edition, June 2016.

U.S. Coast Guard Instruction, 2009, Commandant Instruction 16000.22, Connectivity to the National Response Framework, 2009.