

# An Unmet Need: National-Level Governance for the NIMS/ICS Communications Unit

With an ever-expanding array of communications resources available to incident commanders and a rise in service-level expectations, the need to establish a common governance model across the country to promote and provide consistent recruitment, training, retention, and support for all-hazards incidents must be fulfilled

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## Summary

The effective organization, management, and execution of operations in response to and/or recovery from challenging emergency incidents or complex planned events can be difficult without effective means of communication. Incidents and events may require assets from multiple public safety disciplines, multiple jurisdictions, multiple levels of government, or a combination of any and all of these multiples, and they create demands for the provision and management of communications services and resources. These services and resources may provide for mission-critical emergency communications that are operable, interoperable, and continuously available to the greatest extent possible until operations conclude. To address these requirements, the Communications Unit was established as an important part of the National Incident Management System (NIMS), and within the Incident Command System (ICS). The Communications Unit was organized under the Logistics Section as a service unit supporting internal needs of personnel assigned to incident response and recovery operations at a given emergency.

The proliferation of emergency communications across several bands of spectrum have become more common, more attention being given to preparedness for all hazards incidents, and the cross pollination of consumer access to an array of voice, data, and video capabilities affecting public safety demands, are all driving the need for better governance, training, and procedures in the Communications Unit. Training programs were developed to meet initial expectations for support achieving operability, interoperability, and continuity of radio communications in the field. Thousands of local, state, territorial,

and tribal public safety and telecommunications personnel have been trained to serve as the Communications Unit Leader (COML) over the Communications Unit, under the Logistics Section. While early efforts were successful, gaps have become apparent. A COML alone cannot accomplish the tasks that the Communications Unit are assigned. Other roles in the unit were identified, and efforts are underway to develop professional qualification training to fill those positions. The existing training still does not sufficiently address the delivery of effective data and video communications capabilities.

The problem is that there is no nationwide approach to the before and after facets of building a cadre of qualified All Hazard Type III Communications Unit personnel who can serve their own agencies, their own communities, and in their own states, but also serve when greater needs prevail, such as for multi-state incidents or during incidents of national significance.

To address these gaps, the joint Wireless Public Safety Interoperable Communications Executive Committee/National Council of Statewide Interoperability Coordinators (SAFECOM/NCSWIC) Communications Unit Working Group has assessed the state of personnel, process, and technical resources available. The foremost gap identified is the lack of a governance model to oversee these efforts and to provide continuity in creating and maintain a pool of qualified Communications Unit staff from which agencies can draw when needed. The Working Group looked at well-known and established governance models within the Federal Emergency Management Agency, the National Wildfire Coordinating Group (NWCG), and the United States Coast Guard. There is no national-level organization or consortium organized in the manner of these agencies to take ownership of this problem and to establish common goals and objectives, roster and credential personnel qualified to fulfill the various roles in the Communications Unit, and maintain a database and recertification process to assure that those qualified can be considered reliable and prepared for any assignment, in-state or interstate.

The Communications Unit Working Group sought and reviewed four examples of governance structures used in emergency services to oversee similar interests of consistent recruitment, training, retention, and support for emergency services personnel. An analysis of the attributes of each of these four models indicated that no single governance group exists which offers the characteristics that the Communications Unit Working Group desires, but that there are five key characteristics that the group wishes to adopt and recommend. Further, the Working Group believes that “best in class” attributes from two of these models should be adopted. The five most desirable characteristics identified in the analysis of the four governance models revealed—

1. Establishment of minimum requirements for a baseline governance program (such as training, experience, physical fitness level).
2. Allowance for cooperating agencies to jointly agree upon training, experience, physical fitness level, and currency standards to meet management needs.
3. Support for consistent training for Communications Unit staff.
4. Support by multiple levels of government.
5. Support for the development of a cadre/roster of Communications Unit staff qualified to support all-hazards incident requirements.

This indicates that across public safety, and across the country, personnel who have been engaged in delivering services and resources in the Communications Unit desire a method of attracting potential candidates, retaining existing skilled staff, and developing a common platform for achieving certifications, maintaining qualifications, establishing a cadre or roster of peers to which they can refer when they need

help, or relief, and making available the sort of support network they need to grow and thrive as a technical community within public safety. This paper addresses the current state of the matter, the problems with this state as it currently exists, and identifies the best idea to solve the problems. Finally, it makes recommendations to implement that best idea.<sup>1</sup>

## The State of ICS/Communications Unit Governance

In the aftermath of a number of unprecedented and high-profile major emergencies in the United States during the waning years of the 20<sup>th</sup> Century and into the early dawn of the 21<sup>st</sup> Century, more effective standards and practices for incident management were developed and propagated across all disciplines in the Emergency Services Sector. The overarching model adopted is the National Incident Management System (NIMS), and within, the Incident Command System (ICS), which provides the organizational elements that managing any emergency addresses. This includes organizational elements retained and administered by the incident commander at small incidents, or divided up and assigned to qualified supervisors to reduce span of control to manageable levels at major emergencies or disasters. History and experience using the NIMS/ICS models have developed and provided lessons which have influenced iterative changes to make improvements. Many of these improvements have evolved from a greater focus on roles and responsibilities, and qualifications to fulfill delegated authorities. The Federal host for NIMS/ICS, the Federal Emergency Management Agency (FEMA), has been able to develop better role descriptions, role-specific training, and performance standards for many of the sections, divisions, groups, branches, and units established by NIMS/ICS. One key example, in the emergency communications community, is the development of formal processes for the ICS unit under the Logistics Section, the Communications Unit.

**The Communications Unit was organized under Logistics as a service unit supporting internal needs of personnel assigned to incident response and recovery operations at a given emergency.** The benefits of establishing a Communications Unit have proven themselves time and again, when incidents and events (planned and unplanned) which required multiple-agency, multiple-discipline, or multiple-jurisdiction coordination and task execution, have revealed the need for a key figure to assess the communications requirements for the missions at hand. This key figure has demonstrated their value in identifying the communications resources available, defining the gap between what was needed and what could be used, and developing solutions—which could include procedural, operational, technical, or spectral management approaches—to enable and support interagency communications capabilities.

**This was not without precedent.** The National Wildfire Coordinating Group is a consortium formed by several Federal departments and agencies and national emergency service associations<sup>2</sup> to address the mission of providing “national leadership to develop, maintain, and communicate interagency standards, guidelines, qualifications, training, and other capabilities that enable interoperable operations among Federal and non-federal entities. Although NWCG standards are interagency by design, the decision to adopt and utilize them is made independently by the individual member entities and communicated through their respective directives systems.<sup>3</sup>” One focus of the NWCG from the Communications Unit viewpoint is, of

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<sup>1</sup> Recommendations on implementing the idea put forth will be included in the final draft of the white paper. This version stops just short of that, with the idea that a coalition is needed to implement the idea.

<sup>2</sup> NWCG is comprised of the Bureau of Indian Affairs, the Bureau of Land Management, U.S. Fish and Wildlife Service, and the National Park Service (all of the U.S. Department of the Interior), the U.S. Forest Service (of the U.S. Department of Agriculture), the United States Fire Administration (a subcomponent of the Federal Emergency Management Agency at the U.S. Department of Homeland Security), the International Association of Fire Chiefs, the Intertribal Timber Council, and the National Association of State Foresters

<sup>3</sup> Mission as noted online at <http://www.nwcg.gov/>

course, supporting interoperable communications for wildfire suppression operations which frequently bring multiple-agencies, -disciplines, and -jurisdictions together.

**As more attention has been given to preparedness for all hazards incidents, the scope of the NWCG wildfire support mission was quickly found to be insufficient to support communications requirements in the wider variety of environments found at such incidents.** That wider variety includes above- and below-grade incident scenes, hazardous materials releases, maritime emergencies, mass casualty incidents, urban search and rescue, large impact areas from natural disasters (such as Type III or worse incidents<sup>4</sup>) that would require significant resources and operational activities over a long duration. For example, the Deepwater Horizon petroleum release along the US Gulf Coast required emergency services support, including Communications Unit support for the response and recovery operations, which spanned years. The challenge was the availability of qualified staff to serve as leaders or technicians. The qualified resources were soon exhausted, and it was recognized that the bench strength for the skilled personnel needed was neither deep nor broad enough to be satisfactory. Of course, lesser but more frequent incidents such as crime scenes, structural fires, transportation incidents, and multiple patient incidents take place tens of thousands of times every day across the country and may require Communications Unit support. These incidents have emergency communications support requirements that are quite different from battling wildfires. The U.S. Department of Homeland Security's Office of Emergency Communications, created in part to address these emergency communications support requirements, fostered the development of training to establish the baseline knowledge, skills, and abilities in agencies throughout the country to enable interoperability much faster, when and where needed, and as authorized, without being dependent upon a Federal agency to provide coordination and services to accomplish this task. Working with partners including FEMA, a new offering available through the Emergency Management Institute was created – E969: *All Hazards Type III Communications Unit Leader (COML)*.

**Since the release of COML basic training, thousands of local, state, territorial, and tribal public safety and telecommunications personnel have been trained to serve as the COML over the Communications Unit, under the Logistics Section. While this effort has been very successful, gaps quickly became apparent.** It was not enough to have someone qualified to oversee the delivery of emergency communications and interoperability for incident management, other roles needed similar development. Those roles included Communications Unit Technician (COMT), the person with the technical skills needed to manipulate communications equipment through programming and encryption to assure interoperability is supported, to implement portable and mobile solutions to matrix disparate communications systems together, and to maintain the communications resources provided to promote readiness and accountability. There was also a need for skilled staff (RADO) to operate radio equipment in support of ICS leaders, and skilled managers (INCM) to oversee temporary mission-assigned incident communications centers, all of whom report to a COML when those roles are assigned.

**In addition to gaps in services provided, gaps in achieving qualifications have been revealed.** While FEMA has continued to develop training to certify personnel in these various Communications Unit roles, they each have their own post-training paths to full provider certification and qualification that must be followed. Following the NWCG model, students who successfully complete their minimum standards training are considered apprentice-level ready. They have task books that must be completed under the watchful eye of someone with more experience than they, to whom they can demonstrate the ability to apply the training they have received, and from whom they will continue to learn and develop practical skills through on-the-

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<sup>4</sup> The definitions of FEMA incident types may be found on the worldwide web at <https://emilms.fema.gov/IS200b/ICS0106320text.htm>

job training and/or field experiences, all of which is documented and which builds a résumé leading to journeyman status, becoming a fully qualified service provider in their area of expertise. So, if training to meet a basic standard exists, and a path to achieving full competency has been created, and all of this is a repeatable process, what is the unmet need for oversight raised by this white paper?

## The Problem with the Current State of the ICS/Communications Unit Governance

**The problem is that there is no nationwide approach to the before and after facets of building a cadre of qualified All Hazard Type III Communications Unit personnel who can serve their own agencies, their own communities, and in their own states, but also serve when greater needs prevail, such as for multi-state incidents or during incidents of national significance.** In the absence of a common denominator, every state, territory, and tribal nation has worked through its own solutions to governance, recruitment, training, qualification, retention, and support for its own in-state cadre. Various states and organizations (such as NWCG) have governance structures that they have established independently.

**NWCG has varying certification, recertification, and qualification requirements for each role in the Communications Unit.** There are inconsistent methods for decertification. There is, however, a well-developed system for local control with national governance, and this system has been heavily vetted. The NWCG is well seasoned in supporting Type I-Type IV incidents. Another strength in this system is consistency; deployments will include a well-known communications capability. This works well until the need to integrate with other communications resources already deployed creates challenges (interoperability, familiarity with devices, etc.).

**FEMA/Urban Search & Rescue also brings their own communications capabilities, and manages its own Communications Unit staffing processes.** They have more capability to integrate with other communications resources, but their certification and recertification processes are very informal. The teams are well-versed in all hazards responses, and they have a dedicated funding stream to support their operations. They have strong experience operating in Type I and Type II<sup>5</sup> incident environments.

**The United States Coast Guard has also established internal governance models for qualifying its Communications Unit staff.** As noted earlier, individual states have established their own structures in the absence of a national model.

**There is no national-level organization or consortium organized in the manner of the NWCG to take ownership of this problem and to establish common goals and objectives, roster and credential personnel qualified to fulfill the various roles in the Communications Unit, and maintain a database and recertification process to assure that those qualified can be considered reliable and prepared for any assignment, in-state or interstate.** This is the problem that the Communications Unit Working Group proposes to resolve as described in this white paper.

**The Communications Unit Working Group sought examples of governance structures used in emergency services to oversee similar interests of consistent recruitment, training, retention, and support for emergency services personnel.** While not all of the models considered represent all-hazards responders, the structures of these models were considered favorable and are offered in this segment as ideas to solve the nationwide governance challenge. Each of the models is discussed with consideration of background, structure, benefits, and limitations. The alternatives considered are, in alphabetical order, the—

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<sup>5</sup> *Ibid*, at <https://emilms.fema.gov/IS200b/ICS0106320text.htm>

- All Hazards Incident Management Team Association<sup>6</sup>.
- National Registry for Emergency Medical Technicians<sup>7</sup>.
- National Wildfire Coordinating Group<sup>8</sup>.
- New Jersey Communications Unit Accreditation Program<sup>9</sup>.

**The All Hazards Incident Management Team Association (IMTA) was incorporated in 2010 to provide leadership and education to incident management teams and their members in order to promote, support, improve, and enhance the profession of emergency management based on the incident management team approach.** The IMTA seeks to fulfill its mission by providing educational opportunities, setting standards, and promoting cooperation between Federal, state, local, territorial, tribal, and non-governmental organizations in all phases of incident management. According to the IMTA, the United States Fire Administration is “tracking 128 incident management teams.” The IMTA has launched several initiatives, including developing national standards for training, qualification, and mobilization; publishing position task books to guide candidates seeking qualification for several specific roles in the NIMS/ICS; establishing qualification review boards (QRB), but all allowing for local control by the Authority Having Jurisdiction (AHJ). The IMTA has a corporate charter, and is led by members elected to fulfill corporate roles including president (who also serves as the Chief Executive Officer), first vice president (who serves as the Chief Operating Officer for external affairs), second vice president (who also serves as the Chief Operating Officer for internal affairs), secretary, and treasurer. The IMTA also has an elected Board of Directors, comprised of IMTA members aligned with and representing teams in each of the ten FEMA regions, and one at-large director who also represents any international interests in the association. While the IMTA has established its own governance structure with roles and responsibilities assigned, it is still organizing committees to address these subjects:

- Annual Symposium Planning
- Strategic Planning
- Website management
- Discussion Forum Moderator
- Blogging, social media
- Credentialing
- Marketing/Public Relations
- Standards
- Communications
- Mutual/Automatic Aid/Emergency Management Assistance Compact
- Document Library.

The benefits of promoting the IMTA as a solution to meet the Communications Unit Working Group need are—

- The IMTA has already been created and chartered as an independent corporation.
- The IMTA mission is consistent with the training and support requirements for a nationwide all hazards communications unit governance body.

<sup>6</sup> Content about the AHIMTA drawn from its website at <http://www.ahimta.org/>

<sup>7</sup> Content about the NREMT drawn from its website at <http://nremt.org/>

<sup>8</sup> Content about the NWCG drawn from its website at <http://www.nwcg.gov>

<sup>9</sup> Content about the NJ Communications Unit Accreditation Program drawn from a presentation by John Miller, New Jersey SWIC, dated April 2016

- The IMTA has developed a professional relationship with FEMA and with other Federal departments and agencies including the NWCG, the U.S. Department of the Interior, the U.S. Forest Service, and the U.S. Fire Administration.
- The IMTA has identified goals that include
  - Adopting the All-Hazards IMT materials released by FEMA as National Standards of the Association to include, but not limited to the All-Hazard Position Task Books, Qualifications Manual (310-1), etc.
  - Association members embrace and implement the Association’s National Standards for themselves and their home units.
  - Establish an Association program to recognize individuals and teams that have met the National Standards where their home state has no program or process.
  - Work with States that have existing credentialing processes in place and develop a uniform, national procedure to be utilized and adopted by all states.
  - Have the Association’s National Standards recognized and adopted by all states, territories, tribal and federal agencies in their credentialing process.
- The IMTA recognizes prior learning and is developing a recertification process to assure that those qualified to fulfill roles on an incident management team can be considered reliable and prepared for any assignment, in state or out of state.
- The IMTA is already pursuing the development of standards and qualifications for positions with the NIMS/ICS structure. It has developed qualifications and position task books to help candidates seeking certification in a number of command and general staff roles, including the Logistics Section Chief, under which the Communications Unit now falls in NIMS/ICS. Following the progression of the group’s goals, it will eventually develop similar support for the Communications Unit itself.

The IMTA does have some drawbacks to consider, including—

- The governance structure does not address the need for consistent recruitment and retention of qualified Communications Unit personnel.
- The governance structure is not focused solely on Communications Unit governance.
- The association and its tenets have only been adopted and recognized by six states and one public safety association to date<sup>10</sup>.
- The IMTA is a maturing organization. It is less than ten years old and is still in the forming stage of development itself. While the Interstate Qualifications Committee has been established and is making progress in its mission, the remaining committees are still recruiting members to address their missions.

**U.S. President Lyndon B. Johnson's Committee on Highway Traffic Safety recommended the creation of a national certification agency to establish uniform standards for training and examination of personnel active in the delivery of emergency ambulance service. The result of this recommendation was the inception of the National Registry of Emergency Medical Technicians (NR) in 1970.** The NR has been successful in establishing nationally recognized standards for training and continuing education programs, minimum ambulance equipment requirements, and accreditation for EMT-Paramedics. The mission of the NR is to certify and register Emergency Medical Services professionals throughout their careers by a valid and

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<sup>10</sup> The six states that recognize and use the IMTA tools and standards are Colorado, Oklahoma, Louisiana, Utah, Montana, and Virginia. The sole public safety association to adopt and use the IMTA tools and standards is the International Association of Chiefs of Police

uniform process to assess the knowledge and skills for competent practice. In support of this mission, the NR reported that as of 2005, their examinations were used by 46 states and territories as the sole basis for certification at one or more levels of emergency medical care. The NR notes that “states that do not use the [NR] must develop their own standards, which leads to inconsistency. In addition, these states must develop and defend their own examination/certification process, which may not be recognized by other states.”

The NR is careful to distinguish the terms certification and licensure when considering its role. Certification, as it pertains to medical care, was “defined by the Federal government as the process by which a non-governmental organization grants recognition to an individual who has met predetermined qualifications specified by that organization<sup>11</sup>.” Further, the NR states that “similarly, the National Commission for Certifying Agencies has recently defined certification as ‘a process, often voluntary, by which individuals who have demonstrated the level of knowledge and skill required in the profession, occupation, role, or skill are identified to the public and other stakeholders.’<sup>12</sup>” The NR asserts that there are three key “hallmarks” of certification:

1. That it is a voluntary process;
2. That the process is conducted by a private organization;
3. That the process is executed for the purpose of providing the public information on those individuals who have successfully completed the certification process (usually entailing successful completion of educational and testing requirements) and demonstrated their ability to perform their profession competently.

In this manner, the NR is a certifying organization. It does not license anyone to practice as an EMT at any level, however. Licensure is administered by the AHJ, and it is usually based on a given state’s “grant of legal authority, pursuant to the state’s police powers, to practice a profession within a designated scope of practice. Under the licensure system, states define, by statute, the tasks and function or scope of practice of a profession and provide that these tasks may be legally performed only by those who are licensed. As such, licensure prohibits anyone from practicing the profession who is not licensed, regardless of whether or not the individual has been certified by a private organization.”

The NR sees its role as a private certifying organization. The various state offices of EMS or like agencies serve as the state licensing agencies. Certification by the National Registry is a distinct process from licensure; and it serves the important independent purpose of identifying for the public, state licensure agencies and employers, those individuals who have successfully completed the Registry’s educational requirements and demonstrated their skills and abilities in the mandated examinations. Furthermore, the National Registry’s tracking of adverse licensure actions and criminal convictions provides an important source of information which protects the public and aids in the mobility of EMT providers.

While the NR is a non-profit organization, it does raise revenue by charging fees for examinations, certifications, and other goods and services. The NR is overseen by a Board of Directors, which includes roles of Chair, Immediate Past Chair, Past Chair, and Treasurer, but none of the other traditional corporate roles seen in management, at least not by title as listed on the NR website. The NR does employ an Executive Director.

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<sup>11</sup> As cited from a US Department of Health, Education, and Welfare document, Report on Licensure and Related Health Personnel Credentialing (Washington, D.C.: June, 1971, pg. 7).

<sup>12</sup> NCCA Standards for the Accreditation of Certification Programs, approved by the member organizations of the National Commission for Certifying Agencies in February, 2002 (and effective January, 2003).



The benefits of promoting the NR as a solution to meet the Communications Unit Working Group needs are—

- The NR has been incorporated and in continuous operations for almost 50 years. It has a clear sense of purpose and mission.
- The NR certification model has been adopted by nearly every state and U.S. territory.
- The NR mission is consistent with the training and support requirements for a nationwide all hazards communications unit governance body.
- The NR has a well-established process for testing and certification of emergency medical care providers from the lowest level (EMS First responder) to the highest level (Paramedic) in the delivery of care in the field, and is itself a certified organization.
- The NR has developed a professional relationship with the U.S. Department of Transportation, which still oversees the national training standards for emergency medical technicians. NR certification has been mandated by all of the armed forces for service members and others staffing ambulances that serve military and other U.S. Department of Defense installations.
- The governance structure does not address the need for consistent recruitment and retention of qualified Communications Unit personnel.

The NR does have some drawbacks to consider, including—

- The governance structure is not focused in any manner on emergency communications governance.
- The model focuses on training and retention issues, but not on the recruitment and support issues that need attention.
- The organization was funded by Federal grants and support when established, but it has since become a self-funded organization. It is unclear if similar development support and transition to self-sustainment could be achieved by a nationwide Communications Unit governance body.

**According to its website<sup>13</sup>, the National Wildfire Coordinating Group (NWCG) provides “national leadership to develop, maintain, and communicate interagency standards, guidelines, qualifications, training, and other capabilities that enable interoperable operations among federal and non-federal entities.”**

Although NWCG standards are interagency by design, the decision to adopt and utilize them is made independently by the individual member entities and communicated through their respective directives systems. Member entities include Federal departments and agencies and non-government organizations with interests in preventing and suppressing wildfires. They are:

- U.S. Department of Agriculture/United States Forest Service
- U.S. Department of Homeland Security/Federal Emergency Management Agency and the United States Fire Administration
- U.S. Department of the Interior/Bureau of Indian Affairs, Bureau of Land Management, National Park Service, and the United States Fish and Wildlife Service
- International Association of Fire Chiefs
- Intertribal Timber Council
- National Association of State Foresters.

While the NWCG supports a number of strategic priorities, the overarching priority to which the Communications Unit Working Group can most relate is that “all NWCG activities contribute to safe, effective, and coordinated national interagency wildland fire operations.” To accomplish this and its other

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<sup>13</sup> The NWCG mission is available at <http://www.nwcg.gov/>

strategic priorities, the NWCG is driven by its charter, which was adopted in its most recent version in November 2013. The charter provides the organization’s mission, purpose, membership, goals, governance (including roles and responsibilities), and administration. These are all attributes to which the Communications Unit Working Group aspires to see as a part of a nationwide governance model to meet its requirements.

The NWCG can trace its history to 1976, when the Departments of Agriculture and the Interior signed a memorandum of understanding (MOU) to “establish an operational group designed to coordinate programs of the participating agencies so as to avoid wasteful duplication and to provide a means of constructively working together. Its goal is to provide more effective execution of each agency’s fire management program. The Group provides a formalized system to agree upon standards of training, equipment, aircraft, suppression priorities, and other operational areas. Agreed upon policies, standards, and procedures are implemented directly through regular agency channels.” The other members gradually joined into this MOU to create the NWCG. Again, many of the attributes cited in the original MOU are common to the Communications Unit Working Group’s unmet needs.

The NWCG has fostered the development of training courses, contributed to the development of standards, created a variety of job aids and position task books to guide individuals in achieving credentialed status, and established a publications management system to track documents and assure that they are updated and relevant.

The NWCG has also established the key credential that is essential to eligibility for major emergency response and recovery deployments, the vaunted Red Card. The Red Card was adopted as a requirement for personnel to engage in wildfire suppression operations overseen by the Federal government. While Federal agencies in charge of firefighting at wildland incidents require the card to serve, the card can be obtained by anyone who seeks eligibility for deployment, including Federal, state, local, tribal, territorial and non-governmental firefighting organizations but also by commercial ventures engaged in fire suppression. This ubiquity of eligibility serves well, in that it permits organizations to contribute staff, equipment, apparatus, and other resources to federally-managed wildfire suppression efforts with the understanding that these resources are all commonly known and accepted, even if the path to achieving the Red Card varies due to individual agency requirements. All understand that the minimum requirements to obtain the Red Card have been met and that those holding a valid Red Card can be entrusted with roles, responsibilities, and assignments. The path to earning a Red Card is widely available and there are no mysteries about standards that must be met for eligibility (including training, experience, physical fitness level, and currency standards for wildland fire positions, which all participating agencies have agreed to meet for national mobilization).

The benefits of promoting the NWCG model as a solution to meet the Communications Unit Working Group need are—

- This model has existed for 40 years and continues to thrive.
- The NWCG is a chartered organizational model.
- This model allows cooperating agencies to jointly agree upon training, experience, physical fitness level, and currency standards to meet fire management needs for wildland fire (wildland fire includes wildfire and prescribed fire).
- This model also establishes minimum qualifications for personnel involved in prescribed fires on which resources of more than one agency are utilized—unless local agreements specify otherwise. This may be very appealing to states, tribal nations, territories, or local agencies that have already

developed such minimum qualifications and who do not wish to make changes that they perceive may be relaxing requirements.

- Agency certification and documentation of completion of the position task book is the responsibility of the employing agency. This certification indicates the individual is qualified to perform in a specific position.
- Each agency is responsible for annually certifying qualifications of its personnel based upon the requirements of this guide and agency-specific requirements supplementing this guide. This responsibility includes evaluation of personnel for recertification in cases where position qualifications are no longer valid due to a lack of current experience. If agreed upon, the cycle for certifying qualifications could be changed to meet Communications Unit Working Group interests.
- Successful completion of position tasks and training courses does not guarantee an individual will be qualified to perform in a position. Certification and recertification is a subjective determination each individual agency must make based on task evaluations, position performance evaluations, and their own judgment of the quality of an individual's experience.

There are some NWCG limitations to consider, including—

- The model is focused on wildfire resources and does not have the all-hazards approach that the Communications Unit Working Group requires.
- The model focuses on training and retention issues, but not on the recruitment and support issues that need attention.

**The State of New Jersey developed an accreditation model to address some of the same unmet requirements that the Communications Unit Working Group identified.** The State Public Safety Communications Commission began working on the issue of oversight of New Jersey's Communications Unit resources in 2012. The Commission, which is co-led by the state's Office of Information technology and the Office of Homeland Security and Preparedness (the Chief Technology Officer and the Director, respectively, or their designees), appointed a statewide Communications Unit Working Group. The Statewide Interoperability Coordinator serves as Chair, and emergency communications specialists throughout the state's practitioner community serve. The group's focus was to develop a method and means of statewide recognition as a legitimate resource for the Communications Unit in any NIMS/ICS implementation in New Jersey. After a great deal of discussion and the solicitation of legal advice, the group determined that accreditation was the best term to adopt as its recognition. This resulted in the creation of the New Jersey Communications Unit (COMU) Accreditation Program. The program serves to accredit personnel qualified to serve as a Communications Unit Technician (COMT) and/or as a Communications Unit Leader (COML) but will accredit other COMU positions as needed. The program has established minimum training requirements that must be met, bodies of knowledge that must be reviewed and understood (such as field operations guides and tactical interoperable communications plans), and endorsements from leaders that must be obtained for eligibility as an accredited resource. The New Jersey COMU Accreditation Program has developed processes for initial accreditation and for renewal.

The benefits of promoting the New Jersey COMU Accreditation Program model as a solution to meet the Communications Unit Working Group need are—

- The program supports all hazards Communications Unit operations.
- The program is a state-centric program, consistent with Communications Unit Working Group interests.

- The program has been vetted by a statewide organization that includes elected and appointed officials (the Statewide Public Safety Communications Commission) as well as regional representatives from around the state and representatives from public safety associations representing nearly every function of the Emergency Services Sector.
- The program has an established process for achieving recognition and for assuring that individuals recognized remain current through a renewal process.
- The program processes are practitioner-driven.
- The program reinforces the importance of doctrine developed and supported by the U.S. Department of Homeland Security, including NIMS/ICS, Federally approved COML and COMT training, the National Interoperability Field Operations Guide, and the regional Tactical Interoperable Communications Plans.
- The program makes use of the Communications Asset Survey and Mapping Tool to identify and make available the personnel in the state who have achieved accreditation.
- The renewal process includes a combination of real-world and simulated experiences, continuing education, and reaffirmation of approval by leaders who stand behind the candidate.

There are some COMU Accreditation Program limitations to consider, including

- The model focuses on training and retention issues, but not on the recruitment and support issues that need attention.
- The model is fairly new (two years old as of October 2016) and has not yet matured.
- The model has not yet been adopted by any other states, so out-of-state recognition of New Jersey accreditation has not yet been assessed.

### The Idea on Solving the Governance Problem

**An analysis of the attributes of each of these four models indicated that no single governance group exists which offers the characteristics that the Communications Unit Working Group desires, but that there are five key characteristics that the group wishes to adopt and recommend. Further, the Working Group believes that “best in class” attributes from two of these models should be adopted.** The five key characteristics identified in the analysis of the four governance models revealed are—

1. Establishment of minimum requirements for a baseline governance program (such as training, experience, physical fitness level).
2. Allowance for cooperating agencies to jointly agree upon training, experience, physical fitness level, and currency standards to meet management needs.
3. Support for consistent training for Communications Unit staff.
4. Support by multiple levels of government.
5. Support for the development of a cadre/roster of Communications Unit staff qualified to support all-hazards incident requirements.

To date, the Communications Unit Working Group has neither identified, nor been notified, of a governance body to foster the development of national-level governance for the NIMS/ICS Communications Unit. The NWCG offers the best, most collaborative governance model for the Working Group’s needs, but it is unlikely that the NWCG leadership would expand their group’s mission to meet the all-hazards governance requirements. The AHIMTA offers similar benefits and limitations as those seen in the NWCG model, but that group lacks the maturity desired to establish a national governance for Communications Unit personnel to provide the Working Group with the legitimate support it needs. AHIMTA is also focused on Incident Management Team support, and adding a Communications Unit focus may not be a logical fit.

The idea that offers the most promise in solving the problems identified in the current state is to develop a coalition of organizations focused on establishing a common governance model across the country to promote and provide consistent recruitment, training, retention, and support for All Hazards Communications Unit personnel by way of implementing a model that incorporates the five key characteristics identified on Page 12. **Essentially, the Communications Unit Working Group proposes that its members develop the desired governance structure, and then work to cultivate public safety and emergency communications interests to establish a collaborative and cooperative effort to oversee the structure and provide support for its establishment, maintenance, operation, and improvement of the recommended model.**