June 7, 2016

To Whom It May Concern:

Members of the SAFECOM – NCSWIC Communications Unit Working Group[1] have reviewed the *National Incident Management System (NIMS) Refresh* in accordance with NIMS Alert 01-16: National Incident Management System Refresh: National Engagement Period. The Communications Unit Working Group members focused their attention on the content addressing communications and are providing feedback for review and consideration.

Throughout the *NIMS Refresh* there is all manner of <u>what</u> should be communicated but very little appears to provide information on <u>how</u> information will be managed (e.g. the Communications Unit and Communications Unit leader role).

As a case in point, listed in the introduction, 'Communications and Information Management' is one of the three major components of the document (pg. 2/ln. 33). Then, in the Resource Management Section, under the section on Effective Management of Resources (pg. 12/ln. 376), the document appropriately identifies 'Information Management Systems for Resource Management' as one of the essential elements for incident mitigation. Nowhere does it explain how/who will be responsible for enabling this capability – the assumption would fall to the Communications Unit.

Under the Incident Management and Coordination section, the document identifies NIMS Management and Coordination Characteristics and then specifically calls out:

- Integrated Communications (pg. 16/ln. 517; pg. 18/ln. 593)
- Information and Intelligence Management (pg. 16/ln. 523; pg. 19/ln. 632)

Again, these are completely appropriate characteristics to call out, but the document does not explain how/who will enable this capability.

Within the proposed *NIMS Refresh,* despite the radically increased expectations for managing information flow, expanded communications coverage/reach, and increasingly varied communications formats (voice AND data), the Communications Unit functions remain relatively unchanged from the current implementation and understanding of NIMS.

Clearly, the Communications Unit plays a fundamental role in consistent performance of an effective NIMS-ICS. The SAFECOM/NCSWIC Working Group encourages increased focus on further integration of the Communications Unit into all incident planning and operations. The SAFECOM/NCSWIC Communications Unit Working Group has been collaborating with the Department of Homeland Security Office of Emergency Communications (OEC) to enhance the Incident Communications Unit through the development of:

- Training courses/curriculum
- Clarifying existing position descriptions (COML, COMT, RADO, etc.) to include the all-hazards environment
- New position development (Data specialists, Satellite specialists, etc.)
- National standards for credentialing/certification

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[1]The SAFECOM – NCSWIC Communications Unit Working Group is a collection of members from SAFECOM and the National Council of Statewide Interoperability Coordinators (NCSWIC) tasked with exploring solutions to concerns regarding the current state of the Communications Unit within the emergency communications ecosystem.

The group would encourage the *NIMS Refresh* to clarify the incorporation of the public safety communications perspective throughout the updated document.

The sum experience of members from the working group suggests some common challenges that incident Communications Units face, reducing the effectiveness of that Unit's ability to support overall incident communications. The challenges described tend not to be technical, but procedural in nature. Within the current NIMS-ICS construct, there exists a lack of visibility from the Communications Unit Leader, into command/general staff discussions and planning.

As alluded to within the *NIMS Refresh* document, today the Communications Unit roles and responsibilities are evolving to include a much broader information management responsibility (e.g. voice, data, video, etc.) and oversight of the interfacing with a significantly larger geographical area (worldwide internet access, distant EOCs, other parts of the country, etc.). To facilitate these incidents needs, Communications planners must be engaged in the development of incident action planning at all levels of ICS. Involvement of communications specialists is particularly important for development of ICS documentation including Forms 217 and ICS 205. By including appropriate communications unit representative(s) in incident command planning meetings and discussions, incident commanders will be more likely have their information management requirements met. The working group proposes strategic (long-term) and tactical (short-term) suggestions that could ensure the Communications Unit is represented directly when those meetings take place.

The *NIMS Refresh* document itself identifies <u>communications and information management</u>, <u>resource management</u>, and <u>incident coordination</u> as the essential, strategic elements of NIMS. A discussion regarding the 'path' to better integration of communications and information management, as a principle, throughout the entire ICS structure is likely out of the intended scope of this current *NIMS Refresh* process, but would necessarily include representatives from ICS Communications Units.

<u>Strategic consideration:</u>

In one instance, the proposed changes articulate how the Safety Officer, while a component of the Command Staff, might not always be single resource (pg. 84/ln. 2752), but contain elements (Safety Team?) embedded/spread throughout the ICS structure.

1. Following the Safety 'Team' example, a preferred strategic consideration may include the reassignment of the Communications Unit (or a liaison/representative from within the Communications Unit) from within the Logistics Section to the Command/General Staff – this would be in-line with their charge to support the information needs across <u>all</u> sections. Whether this includes the Communications Unit in its entirety or simply a representative *(i.e. Communications Officer)* from within Communications Unit at the command level, current experiences and after action reports suggest the need for some kind of modification from the current system, to ensure that incident-supporting communications receive proper attention and support. Such a change should be clearly spelled out in the NIMS Refresh document as a prerogative of incident command and incident command is encouraged to call on Communications Unit leader(s) directly as he/she deems necessary.

This may be even more important in supporting emergencies that are quickly evolving and/or escalating, when a lag in communicating incident requirements may compromise plan implementation or response operations.

<u>Short-term considerations:</u>

1. Related to the above-mentioned Strategic consideration, for many all-hazards (e.g. non-wildland) incidents, the ONLY established component of the logistics section is often the Communications Unit. We suggest capturing this concept either through notation and/or, through diagramed organization charts. Such charts may show the Communications Unit in the place of the Logistics Section.

2. While recommending strategic change in NIMS to better support incident communications, the Communications Unit Working Group also suggests consideration of short-term remedies. At a minimum, members of the working group propose elevating the Communications Unit from its current location within the Logistics Service Branch, to the branch level, (still within the Logistics Section). ***The growth in the responsibilities of the Communications Unit and the commensurate increase in staffing necessitate the elevation to the Branch level. The technical expertise and increased role of communications in the all-hazards environment is similar to the Aviation role and therefore should be considered for elevation to the Branch level as Aviation was.*** While activation of sections in the all-hazards environment is rare, the designation of branches can be, and occurs often at many complex incidents.

3. When FEMA EMI and OEC decided on roles for the development of the original COML course (L969), there was discussion about developing a new/additional module for all NIMS/ICS command and general staff courses with focus on the Communications Unit and Communications Center management. In the opinion of the SAFECOM-NCSWIC Communications Unit Working Group, this need remains unfulfilled. The module was to inform new command/general staff trainees of the knowledge, skills, abilities, etc. in the communications unit and the importance of including Communications Unit representatives in the planning processes for the greater support of incident information flow. The Communications Unit Working Group suggests including information to speak to the restructure/placement of the Communications Unit within the ICS and development training modules in Command/General staff courses to address this need for education/awareness about communications in the ICS structure.

Ultimately, the members of the SAFECOM – NCSWIC Communications Unit Working Group recommend that there should be more information regarding the 'Communications Unit' contained within the *NIMS Refresh,* a consolidation (vs. division) of communications support efforts throughout this ISC structure, and better articulation of 'who' will support incident information needs/flow.

Thank you for your time and consideration,

Members of the SAFECOM – NCSWIC Communications Unit Working Group

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