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Office of Emergency Communications / Interoperable Communications Technical Assistance Program

Incident Command System (ICS) Communications Unit (COMU) Implementation and Best Practices

A Guide for Program Development

December 2012

Acronyms used in this Guide	
Acronym	**Meaning**
AAR	After Action Report
AHJ	Authority Having Jurisdiction
APCO	Association for Public-Safety Communications Officials, International
CAD	Computer Aided Dispatch
CASM	Communication Assets Survey and Mapping Tool
CCP	Citizen Corps Program
CDO	Communications Duty Officer
COMC	Communications Coordinator (ICS)
COML	Communications Unit Leader (ICS)
COMLEX	Communications-specific exercises
COMT	Communications Technician (ICS)
COMU	Communications Unit (ICS)
DHS	U.S. Department of Homeland Security
EC	Executive Committee (NCSWIC)
EMA	State Emergency Management Agency
EMAC	Emergency Management Assistance Compact
EMI	Emergency Management Institute
EOC	Emergency Operations Center
ESF2	Emergency Support Function 2
FEMA	Federal Emergency Management Agency
FFCA	Florida Fire Chiefs Association
Fire IDT	Fire Incident Dispatcher
HSGP	Homeland Security Grant Program
IAP	Incident Action Plan
IC	Incident Commander
ICC	Incident Communications Center
ICS	Incident Command System
ICTAP	Interoperable Communications Technical Assistance Program (DHS OEC)
IDT	All-Hazards Incident Dispatch Team
IECGP	Interoperable Emergency Communications Grant Program
IMT	Incident Management Team
INCM	Incident Communications Center Manager (ICS)
LETG	Law Enforcement Tech Guide
LSC	Logistics Section Chief (ICS)
MMRS	Metropolitan Medical Response System
MOBGuide	Mobilization Guide
MOU	Memorandum of Understanding
MsgR	Message Runner (ICS)
NAC	NIEC Advisory Committee
NASNA	National Association of 9-1-1 Administrators
NCSWIC	National Council of Statewide Interoperability Coordinators
NECP	National Emergency Communications Plan

NEMA	National Emergency Management Association
NENA	National Emergency Number Association
NIEC	National Institute for Emergency Communications
NIFC	National Interagency Fire Center
NIICD	National Interagency Incident Communications Division (NIFC)
NIIX	National Interoperability Information eXchange
NIMS	National Incident Management System
NPSTC	National Public Safety Telecommunications Council
NRF	National Response Framework
NWCG	National Wildfire Coordinating Group
ODP	Office of Domestic Preparedness
OEC	Office of Emergency Communications (DHS)
OIC	Office of Interoperability and Compatibility (DHS)
OPSG	Operation Stonegarden
PMBOK®	Project Management Body of Knowledge Guide
POC	Point of Contact
POST	Peace Officer Standards and Training
PSAP	Public Safety Answering Point
PSIC	Public Safety Interoperable Communications
PSWN	Public Safety Wireless Network Program
PTB	Position Task Book
RADO	Radio Operator (ICS)
SAA	State Administrative Agency
SCIP	Statewide Communications Interoperability Plan
SHSP	State Homeland Security Program
SICTEP	Strategic Interoperable Communications Training and Exercise Plan
SIEC	Statewide Interoperability Executive Committee
SIGB	Statewide Interoperability Governing Body
SME	Subject Matter Expert
SOP	Standard Operating Procedure
STR	Strategic Technology Reserve
STO	State Training Officer
SWIC	Statewide Interoperability Coordinator
TDT	Tactical Dispatch Team
TERT	Telecommunicator Emergency Response Taskforce
THSP	Technical Specialist (ICS)
TICP	Tactical Interoperable Communications Plan
TtT	Train the Trainer
UASI	Urban Area Security Initiative
USAR	Urban Search and Rescue

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Introduction

ABOUT the Guide

Preface

The Department of Homeland Security Office of Emergency Communications (DHS OEC) established the National Institute for Emergency Communications (NIEC)[1] in 2010. DHS OEC funded the NIEC through a congressionally sponsored grant. Operated by SEARCH, The National Consortium for Justice Information and Statistics, and working in partnership with OEC and others, the NIEC addresses some of the more critical issues facing the first responder community today. They created the NIEC to address gaps in four areas:

- Provide "Just In Time" training in a rapidly changing environment

- Provide additional support to statewide and regional interoperability coordinators

- Target decision-makers and public officials vested with making critical planning decisions

- Provide public safety-specific project management training and tools.

There is a strong contingent of Statewide Interoperability Coordinators (SWICs), along with a growing cadre of regional and local public safety communications personnel, charged with overseeing interoperability and emergency communications efforts. These coordinators have expressed, and a comprehensive analysis confirmed, an urgent need for current and relevant information relating to key topics. Along with training and program development guidance and standardized tools to assist with emergency field communications units, the need exists to establish a process to train and deploy communications support within the Incident Command System (ICS) structure. To address this need, the NIEC project team engaged in a collaborative process with the NIEC Advisory Committee (NAC) and a diverse working group of subject matter experts (SMEs)[2] from across the nation to prepare this guide.

An ICS Communications Unit Program provides stakeholders with a plan of action to facilitate and coordinate initiatives, procedures, and scheduled activities that enable the Communications Unit—known as COMU— to operate efficiently and effectively within the ICS. The ICS COMU Program is a vehicle to conduct strategic planning that will ensure ICS COMU initiatives and activities dovetail with existing communications and interoperability plans.

To prepare organizations to set up and sustain ICS Communications Unit Programs at the local, regional, and state levels, this guide addresses the following key topics:

- Model approaches to COMU Program development, as well as assessment tools, to understand where a COMU Program is, and where it needs to go

- Mechanisms for funding and strategies for developing program sustainability

- Exercises and responding to After Action Reports (AARs)

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[1] The NIEC operates as a Center for Excellence in First Responder Interagency Communications in an effort to promote excellence in interoperability, emergency communications, and public safety broadband among the nation's first responders.
[2] The NAC members and SMEs who contributed to this publication are listed in Part 2.

- Requirements and approaches to training, recognition, currency, and continuing education

- Clarifying the training application and Position Task Book (PTB) processes, including recordkeeping, available technical assistance, and exercise opportunities

- Identifying standard operating procedures (SOPs) and using best practices templates

- Expanding the target audiences for training, including awareness training and developing tools to increase the awareness of lawmakers, command staff, and executives of the benefit of deploying COMU positions.

This *Incident Command System Communications Unit Implementation and Best Practices* guide targets SWICs and other public safety stakeholders whose responsibilities include overseeing public safety communications or interoperability projects—or both. It focuses on key elements, performance measures, and assessment from the perspective of enhancing existing COMU practices, policies, and procedures through to an advanced level of program implementation. This guide provides examples of states, regions, and local agencies around the nation that have demonstrated success in developing and managing specific Communications Unit Program development efforts as part of broader goals and initiatives. These goals and initiatives relate to the National Emergency Communications Plan (NECP), SAFECOM Interoperability Continuum, National Incident Management System (NIMS), National Response Framework (NRF), and the plethora of other Federal initiatives where the states are striving to achieve compliance.

The evolution of Communications Unit information is changing as rapidly as the technology associated with it. Therefore, consider this guide to be a snapshot in time, as advancements related to the information presented in this guide are constantly taking place.

How This Guide is Organized

Organized in two parts, this guide provides a variety of historical and contemporary information, along with access to current models, templates, and best practices specific to all-hazards Communications Unit positions. This guide focuses on implementing an "All-Hazards" COMU Program and addresses developing the human resources component of interoperability. It does not address either training content or how to make specific pieces of technology work.

- **Part 1 – ICS Communications Unit Program Development**

- **Part 2 – ICS Communications Unit Program Best Practices, Tools, and Resources**

The information presented for each element introduced in Part 1 follows the same layout, as shown in the following table:

ABOUT…

The information under this blue-shaded "ABOUT" heading explains the element from a Communications Unit perspective.

Paths, Roads, and Routes toward …

The information under this grey-shaded "Paths, Roads, and Routes" heading reminds you to use the *ICS Communications Unit Assessment and Development Matrix*, a supplement to this guide. The matrix provides performance measures to determine **where you are and where you need to go**. This information will help drive the evolution of a Communications Unit Program from early through advanced development in the primary elements. Impediments common to COMU Program performance include a constant low level of development in any of the following COMU Program elements listed and discussed in this guide:

- **Governance**
  (Leadership, Decision-making Structure, Agreements, Strategic Planning, SWIC Integration, State Training Officer [STO] Integration)

- **Funding**
  (Operational, Sustainability)

- **Training, Exercises, and Staffing**
  (Initial Training, Recurrent Training, Exercises, Communications Unit Leader [COML], Communications Technician [COMT], Incident Communications Center Manager [INCM], Radio Operator [RADO], Other Positions)

- **Recognition and Currency**
  (PTB, Currency)

- **Usage**
  (Requests, Deployment, Integration)

- **Standard Operating Procedures**
  (Policies, Procedures, and Practices)

- **Other User-defined Elements**

- **Communications Unit Program Planning**
  (Program Plan, Program Communications Plan, Program Risk Management Plan, Program Assessment)

We reviewed and categorized the information based upon what the research indicated that the more mature COMU Programs have in common. Performance measures for each element (sub-elements) reside under the heading of *Early, Moderate, Full,* or *Advanced Development*:

Sub-elements of Communications Unit Program	Early Development	Moderate Development	Full Development	Advanced Development
	Little or no activity in the element or sub-element	Some progress in the element or sub-element	Substantially complete progress in the element or sub-element	Efforts to sustain and assure continuous improvement of Communications Unit Program development into the future

If your desired destination for an element is beyond *early development*, it may help to have a roadmap to guide you. For some, the destination might not be *advanced development*. Your situation and the culture of your organization may determine that *moderate* or *full development* best suits your needs. Use the matrix as a supplement to this guide to assess your COMU Program and subsequently plan for future development and maintenance.

With the impediments and destinations laid out, the question to answer is, "How are other states successfully making the trip?" What is working for others that could be applied on a larger scale or to meet your unique needs? In some cases, the approach could be as simple as tapping into an existing resource or organizational structure once you realize a gap exists. A supplement to this guide, *ICS Communications Unit Program Development Activities by State,* is accessible for review and updates by all SWICs and other personnel responsible for COMU Program development at www.publicsafetytools.info.

To keep users and stakeholders moving toward the objective is not about detailing the "exact" path, road, or route everyone has to take to reach the destination. Instead, we endeavor to clearly identify the destination itself. This will keep everyone involved with Communications Unit development on the "same" map and headed toward the COMU Program objectives. From there, even if stakeholders need to take different approaches to get to the chosen destination because of their unique impediments, relationships, and resources, everyone still knows where to go. When changes in direction do occur, communicating changes to stakeholders in a timely manner ensures everyone stays on the same map. We will discuss how to communicate those changes effectively using a program Communications Plan later in this guide.

The information presented in **Part 2 – ICS Communications Unit Program Best Practices, Tools, and Resources** provides synopses and access to the aforementioned supplemental materials, along with current models and templates. This guide will do its best not to spend time preaching to the choir, rehashing common terminology, or reinventing the wheel. The information in Part 2 provides a collective, but certainly not exhaustive, list of information to help you access resources and documents already in existence. As previously noted, the topic of COMU positions and programs overall is rapidly evolving; therefore, the references contained in this section are only as accurate as the information available at the time this guide was written.

How to Use This Guide

The intent of this guide is to provide strategies, best practices, recommendations, and ideas for establishing a Communications Unit Program in your state, region, agency, or tribal jurisdiction. Do not construe this guide as legal advice for any specific factual situation. This publication should serve as a guide for situations generally encountered in developing and implementing All-Hazards COMU Programs as part of broader communications goals and initiatives identified in Statewide Communications Interoperability Plans (SCIPs), Tactical Interoperable Communications Plans (TICPs), NECP Goals and Interoperability Continuum initiatives, and NIMS compliance. It does not replace or supersede any policies, procedures, rules, and ordinances applicable to your jurisdiction. It is not a substitute for effective legal counsel and is not be interpreted as a legal service.

This guide does not endorse any particular COMU Program. It demonstrates the complexity of the COMU Program development environment, while creating an awareness of contemporary themes, trends, and best practices. This document serves as a tool for every SWIC and other public safety stakeholders charged with overseeing interoperability and public safety communications projects. It can help you understand the national ICS Communications Unit Program development environment and determine how to bring it all together at the state, regional, and local levels. This publication seeks to provide information on available tools and technical assistance to help you achieve your COMU Program development goals and objectives.

Representatives from seven states participated in individual interviews.[3] The ICS Communications Unit Programs in these states ranged from early to advanced development in one or more elements. The results of a survey sent to all the SWICs provided data relating to other states.[4]

6 Facts to Know Before You Read This Guide

Fact #1: You are not alone. The Executive Committee (EC) of the National Council of Statewide Interoperability Coordinators (NCSWIC) made the request to gather information about where states stand in regard to their Communications Unit programs.[5] Arizona SWIC Lisa Meyerson conducted the survey and compiled the data. The EC distributed a summary report to the SWICs.

Fact #2: It is challenging to implement an ICS All-Hazards Communications Unit Program.

Fact #3: Lack of communications coordination is a significant gap routinely reported during exercises and real-world incidents.

Fact #4: The keys elements to successfully implementing an ICS Communications Unit Program apply to *all* disciplines and public safety governance structures (state, regional, local, and tribal).

Fact #5: The use of ICS Communications Unit position-specific personnel in all types of incidents can improve incident response and outcomes.

Fact #6: There is not, nor should there be, a one-size-fits-all approach to implementing an ICS Communications Unit Program.

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[3] Interviewed representatives were from the states of Arizona, Georgia, Minnesota, Missouri, Ohio, Oregon, and Tennessee.

[4] Out of 56 states and territories surveyed, there was a 54% response rate. Organizers applied due diligence by making telephone calls to states that did not respond initially.

[5] See http://www.dhs.gov/files/programs/gc_1286986920144.shtm.

Part 1: ICS Communications Unit Program Development

History of NIMS ICS All-Hazards Communications Unit

Since the late 1970s, Wildland Fire Incident Management Teams have recognized the need for a dedicated Communications Unit (COMU) on significant incidents. The Incident Command System (ICS) organizes the COMU under the Logistics Section Chief (LSC). To help fulfill all of its responsibilities, a fully staffed Communications Unit will feature a number of personnel in a variety of roles. The typical unit consists of a Communications Unit Leader (COML), one or more Communications Technicians (COMTs), one or more Incident Communications Center Managers (INCMs), one or more Radio Operators (RADOs), Technical Specialists (THSPs), and Message Runners (MsgRs) as required. Incidents may need one or more positions but not necessarily all of them.[6] COMU personnel roles are as follows:

COML – Plans and manages the technical and operational aspects of the communications function during an incident or event

COMT – Installs and troubleshoots communications equipment

INCM – Manages an Incident Communications Center (ICC), when having the COML do so would present span-of-control issues

RADO – Staffs the ICC, using radios to receive information and relay messages

THSP – Catch-all term for outside specialists providing expertise to the COML including amateur radio, computer network technicians, and satellite communications (SATCOM)

MsgR – Physically relays messages to areas not yet served with any communications system

Following the events of September 11, 2001, a Presidential Executive Order required all significant events to use the National Incident Management System (NIMS). The NIMS includes information on the Communications Unit and enhances ICS. Due to different technical and operating environments that non-wildfire events and incidents present, public safety determined the Wildfire COMU training was insufficient for the all-hazards environment.

Typically, when law enforcement or fire events go awry, responders will cite failure in communications when asked for feedback for the After Action Reports (AAR). This trend appears to be diminishing to some degree, according to state public safety communications officials we interviewed that have completed the National Emergency Communications Plan (NECP) Goal Validation processes. These representatives attribute the reduction in part to the integration of the COMU into incident planning and operational strategies.

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[6] More information regarding the background of communications within the NIMS and the ICS is available in an *Issue Brief* prepared by SEARCH and published by the U.S. Department of Justice Office of Community Oriented Policing Services (COPS). The *Issue Brief*, "Communications in the Incident Command System," examines the role of communications within these constructs, as well as in the context of multiagency response to disasters and emergencies. It concludes with operational best practices for effective use of ICCs: http://www.cops.usdoj.gov/files/ric/Publications/communicationsics.pdf

If the COML is not persistent about being involved with operational planning, the result can be an expectation at the command level of operational capabilities that the Communications Unit cannot support. This should not suggest the COMU sets policy or directs operations for the incident. Rather, that in the decisions made by the command and general staff, they gave due consideration to the communications resources and personnel available to support those decisions. Many Logistics Section Chiefs have recognized this weakness and now include the COML or other Communications Unit personnel in the planning process. This action serves to reduce or eliminate one more potential problem areas once an operation starts.

In a wildfire scenario, the Communications Unit is typically using resources from the National Cache,[7] which are all essentially identical. When deployed to a wildfire, nearly the entire focus of the COMU is on radio equipment. There is limited or no training on telephone, information technology, gateway, or satellite technologies that are common communications tools in the all-hazards environment. In the all-hazards environment, the expectation is for the COMU to provide all aspects of communications, quickly and often with a very limited staff.

In an effort to resolve the issues involved with planning- and response-associated expectations and limitations of Communications Units in the all-hazards environment, the DHS Office of Interoperability and Compatibility (OIC), and later the Office of Emergency Communications (OEC), established a large group of practitioners from agencies around the country. They represented large and small public safety agencies, in multiple disciplines and using multiple technology solutions. This group created the initial All-Hazards COML course, based on the foundation of the wildfire COML course (S-358).[8]

Since the initial rollout of the course in 2008, many jurisdictions nationwide have hosted the All-Hazards COML course. It has generally received very good reviews. The All-Hazards COML course underwent a major rewrite in 2011, and moved from OEC to the Federal Emergency Management Agency (FEMA) for support. Future reviews and revisions will likely occur as technology continues to advance.

Subsequent to the All-Hazards COML course deliveries, DHS identified a critical need for COMT training in the all-hazards environment. Once again, the wildland model failed to address the diversity of equipment and systems employed around the nation. DHS brought together a similar group of practitioners and developed a course that includes telephone, information technology, gateway, and satellite material along with land mobile radio. The course also includes best practices and lessons learned from both the wildland and All-Hazards COMT community nationwide.

The All-Hazards COMT course is more challenging to deliver, due to the considerable diversity of systems, equipment, and personnel available around the nation. Like the All-Hazards COML course, the All-Hazards COMT training receives good reviews and

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[7] The National Interagency Incident Communications Division (NIICD) of the National Interagency Fire Center (NIFC) maintains the National Incident Radio Support Cache in Boise, Idaho. The cache primarily supports wildland fires; however, it may show up on any large incident such as floods, hurricanes, law enforcement, and tornadoes. The NIICD Communications Duty Officer coordinates the use of these to avoid interference with nearby incidents: http://wiki.radioreference.com/index.php/National_Incident_Radio_Support_Cache
[8] See http://www.nationalfiretraining.net/course_catalog/show/id/94.html

appears to be an effective next step in delivering all-hazards communications training to the field personnel who need it.

As DHS-approved instructors delivered the COML and COMT courses throughout the country, the need for additional skilled instructors naturally developed. To be accepted into a COMU Train-the-Trainer (TtT) course and recognized as a DHS-approved instructor, candidates must meet strict qualification guidelines and be recognized by DHS. Some states have goals to develop cadres of instructors so they can meet initial and currency training needs. Recruiting instructors with the right skillset to be a successful COML or COMT instructor is critical to the success of COMU programs nationwide.

Additionally, as the COMU program matured, OEC identified a need for training personnel that serve in auxiliary emergency communications (AuxComm) positions such as amateur radio operators. Public safety and emergency response staff have used amateur radio services when other forms of communications have failed or been disrupted. The AuxComm course supplements and standardizes an operator's experience and knowledge of emergency amateur radio communications in a public safety context.

OEC and FEMA no longer "type" communications positions, and training courses no longer contain references to "typing." Here's a tip when you are searching Internet sources for training courses: If the particular course description includes "typing" references (i.e., Type III Communications Unit Leader – COML), *it is outdated material*. All NIMS ICS Communications Unit positions are "all-hazards" without references to typing (i.e., NIMS ICS All-Hazards COML).

Considerations When Implementing a Communications Unit Program

ABOUT Governance

Pick up any of the multitude of guidebooks, manuals, how-to publications, or papers targeted at public safety communications and interoperability, and you will ultimately see the term "governance."[9] Governance is one of the five lanes in the SAFECOM Interoperability Continuum and the focus of many NECP—and ultimately SCIP and TICP—initiatives.[10] Without sustainable governance, projects and programs will be challenged and likely succumb to defeat as a result of a fragmented infrastructure, inconsistent structure and controls, inequality of services in the form of equipment, technology, un/under-served areas, lost opportunities for competitive and noncompetitive funding, and greater costs of services.[11]

The NECP identifies the following objectives to improve emergency communications for Federal, state, local, and tribal emergency responders:

1. Formal decision-making structures and clearly defined leadership roles coordinate emergency communications capabilities.

2. Federal emergency communications programs and initiatives are collaborative across agencies and aligned to achieve national goals.

3. Emergency responders employ common planning and operational protocols to effectively use their resources and personnel.

4. Emerging technologies are integrated with current emergency communications capabilities through standards implementation, research and development, and testing and evaluation.

5. Emergency responders have shared approaches to training and exercises, improved technical expertise, and enhanced response capabilities.

6. All levels of government drive long-term advancements in emergency communications through integrated strategic planning procedures, appropriate resource allocations, and public-private partnerships.

7. The Nation has integrated preparedness, mitigation, response, and recovery capabilities to communicate during significant events.

Leadership in the form of executive sponsorship is critical and lays the foundation for initiatives. Executive sponsors are the champions of interoperability programs and projects. Having the right players goes a long way when it comes to successfully developing and maintaining a COMU Program at a level that meets your needs. Get a good decision-making structure in place now and the process will be much easier. Setting a solid foundation of governance is the key to a good start.[12]

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[9] In SAFECOM's *Statewide Interoperability Planning Guidebook* (March 2007), "governance" refers to establishing a shared vision and collaborative decision-making process that support interoperability efforts to improve communication, coordination, and cooperation across disciplines and jurisdictions:
http://www.safecomprogram.gov/SiteCollectionDocuments/StatewidePlanningGuidebookFINAL.pdf

[10] See http://www.safecomprogram.gov/SiteCollectionDocuments/Interoperability_Continuum_Brochure_2.pdf

[11] As it relates to COMU Program implementation and development, the consensus among the SME working group was that even though funding is included in governance, fluctuating economic environments warrant addressing funding under a separate heading in this publication. They also recommended adding SWIC/ SSTO integration as sub-elements for governance.

[12] Find key elements of executive sponsorship and creating a decision-making structure at http://www.search.org/products/governance/governance/

Paths, Roads, and Routes toward Governance

Like interoperability, Communications Unit Program development is an ongoing process—not a one-time investment. To make any program work, the governance structure must stay engaged, be responsive, and actively work to achieve the set goals and objectives. If COMU personnel are expected to be adept at performing in the field environment under less-than-ideal conditions, then *all* aspects of the unit—including staff, technology, and SOPs—must be solidly in place and maintained with commitment to both short- and long-term solutions.

Common policies, practices, and procedural approaches to successfully implement and maintain COMU Program governance include:

- Engage in a methodology to establish a decision-making structure, if one does not exist. If one does exist, ensure it is clear and communicated to stakeholders.

- Appoint a SWIC. Ideally, a full-time SWIC focused solely on communications efforts such as exists in several states is the route to take. If a full-time position is not feasible and it is an "other duties as assigned" position, allow time for engagement in the NCSWIC[13] and other SWIC activities to provide an opportunity for learning and understanding the processes associated with the position.

- Engage the STO in the process to provide integrated communication training opportunities and coordinated training through an existing training authority. The State of Arizona effectively coordinates with their State Emergency Management Agency (EMA) for this purpose.

- Develop a communications working group or other committee that works under a legislatively endorsed statewide interoperability group. The names of the interoperability groups vary, and are sometimes referred to as the Statewide Interoperability Executive Committee (SIEC) or Statewide Interoperability Governing Body (SIGB).

- Legislative authority.

- Clear roles and responsibilities.

- Include the elements of a COMU Program—identified in the assessment matrix referred to throughout this guide—in SCIPs and TICPs.

- Leverage existing resources in the governance structures, such as EMA training, interoperability committees, Emergency Support Function 2 (ESF2),[14] Emergency Management structure, Fire Marshal Offices, State Police and Fire Rescue agencies, Forestry agencies, the Association for Public-Safety Communications Officials, International (APCO), the National Emergency Number Association (NENA), and 9-1-1 structures.

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[13] The NCSWIC assists state and territory interoperability coordinators with promoting the critical importance of interoperable communications and sharing best practices to ensure that the highest level of interoperable communications is achieved for America's first responders and the individuals they serve. NCSWIC members, composed of SWICs from the 56 states and territories, play a key role in preparing public safety responders. They develop bottom-up governance structures and SOPs, strategically develop and implement voice and data technologies, and develop training, exercises, and outreach. See footnote 5.

[14] Emergency Support Function 2 (ESF2) is activated when a significant impact to the communications infrastructure is expected or has occurred. When activated, ESF #2 provides communications support to the impacted area. ESF #2 support is scalable to meet the specific needs of each incident response, and response resources are drawn from a matrix of personnel and equipment available from the ESF #2 support agencies: www.fema.gov

- Policy-maker awareness.
- Clear leadership and vision.
- Effective state oversight to provide funding and logistical support.

ABOUT Funding and Sustainability

Funding is probably the biggest challenge facing Communications Unit Program development. Grants can only take an organization so far, and when combined with a failure to participate in lifecycle planning, it is not long before agencies end up having to walk away from programs and systems they have built.[15] Many solid programs started with Federal dollars, but the question now is how to keep these programs thriving. There is huge potential for COMU Programs built with Federal dollars to slide backwards if organizations continue to rely on grants to sustain their programs. Reporting states indicated that the main sources of funding for COMU training and exercises include:

- Interoperable Emergency Communications Grant Program (IECGP)[16] grants
- Public Safety Interoperable Communications (PSIC) grants[17]
- Urban Area Security Initiative (UASI) programs through the Homeland Security Grant Program (HSGP)[18]
- DHS pilot projects
- DHS OEC Interoperable Communications Technical Assistance Program (ICTAP)[19]
- State emergency management structures.

Most people think of sustainment only in the terms of the ability to provide by furnishing funds. Sustainability, however, includes provision of organizational "means." People get upset when grant programs are cut and public safety communications programs are the casualties. Now, they face competition as funds are combined with other grant programs. If existing COMU Programs are going to survive, they cannot dwell on what "was" for very long. Sustainable funding is required to make them work. Without funding, organizations may have to scale back their efforts. The time has come to bring the stakeholders together, view sustainment from a holistic perspective, and start thinking of alternatives for making things happen.

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[15] "Many Federal grants require grantees to submit a system life cycle plan with grant applications." FY 2011 SAFECOM Guidance of Emergency Communications Grants:
http://www.safecomprogram.gov/SiteCollectionDocuments/FY_2011_SAFECOM_Guidance_121510.pdf
[16] This grant program ended in FY2011: http://www.fema.gov/pdf/government/grant/IECGP.pdf
[17] The PSIC Grant Program assists public safety agencies to acquire, deploy, and train for use of interoperable communications systems that use—or enable interoperability with communications systems that can use—reallocated 700 MHz spectrum for radio communications: http://www.fema.gov/pdf/government/grant/bulletins/info248_PSIC_FAQ.pdf
[18] The Fiscal Year 2011 HSGP provided a primary funding mechanism for building and sustaining national preparedness capabilities. HSGP is comprised of five interconnected grant programs: State Homeland Security Program (SHSP); UASI; Operation Stonegarden (OPSG); Metropolitan Medical Response System (MMRS); and Citizen Corps Program (CCP): http://www.fema.gov/government/grant/hsgp/#2
[19] ICTAP is administered by DHS OEC. Federal funding supports OEC/ICTAP services provided at no cost to the requesting agencies or organizations. Funds are limited, and OEC, in collaboration with requestors, will prioritize the acceptance or deferring of requests. Each State/Territory may request up to five technical assistance offerings. The current technical assistance catalog is available: http://www.publicsafetytools.info/start_index.php

Paths, Roads, and Routes toward Funding and Sustainability

When we do not maintain our infrastructure, it breaks down and eventually fails. The same can be true for all the programs developed using grant funding over the years. Just like roads and bridges, a sustainable Communications Unit Program requires continual support and updates.

Lifecycle planning is one of the keys to funding and sustaining communications systems.[20] In 2008, DHS OEC established a set of initiatives and milestones to address lifecycle management within the NECP.[21] A **project lifecycle management**[22] approach to Communications Unit Program planning can be helpful so you do not underestimate costs, become grant-dependent, and avoid making plans and commitments based solely on short-term rather than long-term goals and objectives. Sustainability planning improves chances for COMU Program survivability during hard economic times. To maximize grant opportunities, use **lifecycle planning tools**, develop a **business case**, and confirm a **funding and sustainment strategy**.

Common policies, practices, and procedural approaches to successfully implement and maintain Communications Unit Program funding include:

- Learn how the technical assistance process works and actively participate in the process.[23]

- Build and maintain strong relationships and partnerships with existing entities.

- Drive efficiency by consolidating activities such as training coordination with existing state, regional, and local facilities.

- Consider outsourcing, if feasible.

- Consider volunteer personnel such as amateur radio organizations.

- Be aware that ongoing local funding can complement existing grant funds and serve as a mechanism for sustaining existing interoperability investments; it can also be set aside to invest in future efforts.

- Think creatively when it comes to funding, such as sharing administrative expenses between regions, and conducting a funding strategy review.[24]

- Engage in a process to conduct a lifecycle cost estimate, review possible funding mechanisms, and integrate them into a comprehensive funding strategy to sustain a program.

Many legislators and executives may not have a clear understanding of the importance of integrating Communications Unit personnel into incident planning and response. Planners

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[20] http://www.safecomprogram.gov/library/lists/library/DispForm.aspx?ID=324
[21] NECP Objective 6: System Life-Cycle Planning, Current Emergency Communications Activities, Initiative 6.1: Conduct system life-cycle planning to better forecast long-term funding requirements, and Recommended National Milestones: http://www.safecomprogram.gov/natlemergencycommplan/Default.aspx
[22] *A Guide to the Project Management Body of Knowledge* (PMBOK® Guide, 4th Edition): http://www.pmi.org/PMBOK-Guide-and-Standards.aspx
[23] See footnote 19.
[24] For additional funding sources, see *The National Summary of Statewide Communication Interoperability Plans (SCIPs),* February 2009: http://www.npstc.org/download.jsp?tableId=37&column=217&id=532&file=National%20Summary%20of%20SCIPs_February%202009.pdf

need to engage in extensive education and marketing of emergency communications from a business case perspective. Outreach and marketing are vital to persuade key stakeholders to support and fund the Communications Unit Program beyond the leadership/executive sponsor role.[25]

In times when human resources are as scarce as funding, it is important to determine what funding sources have the greatest overall potential for acquisition and at what point the funding alternative becomes worth the allocation of resources to pursue. A *Communications Unit Program Sustainable Funding Strategy Tool* is available as a companion to this guide. The template provides instructions on how to use the Communications Unit Program Sustainable Funding Strategy Tool—what to consider, who to engage, and what information to collect—and provides three sample worksheets.[26]

ABOUT Training, Exercises, and Staffing

To help fulfill all the responsibilities of the Communications Unit, a fully staffed COMU will feature a number of personnel in a variety of roles. Incidents may not have every position assigned, but those the Incident Commander (IC) may choose from are:

COML	Plans and manages the technical and operational aspects of the communications function during an incident or event
COMT	Installs and troubleshoots communications equipment
INCM	Manages an ICC, when having the COML do so would present span-of-control issues
RADO	Staffs the ICC, using radios to receive information and relay messages
THSP	Catch-all term for outside specialists who provide expertise to the COML
MsgR	Physically relays messages to areas not yet served with any communications system

Training and exercises are the instructional support designed to develop knowledge, skills, and performance of emergency response personnel.[27] Training and exercises are important to set the foundation for successful usage during an incident. ICS COMU position-specific classes are technical and can be complex, so quality training means quality instructors are teaching quality students. To successfully execute training and exercises, clearly defined processes must be in place to acquire, deliver, and document initial position and instructor training, as well as continuing education training in the form of exercises. This requires a high degree of coordination and positive working relationships with all decision-makers and stakeholders.

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[25] The Public Safety Wireless Network Program (PSWN) developed the *How 2 Guide for Funding State and Local Public Safety Wireless Networks* in 2002. The How 2 guide contains information to identify funding audiences and conduct funding outreach that is useful across many programs, including COMU Program development: http://www.safecomprogram.gov/SiteCollectionDocuments/ How_to_guide_for_funding_state_and_local_PSWN.pdf

[26] Part 2 of this guide contains information on an ICS Communications Unit Program funding strategy tool. Several sources were used to develop the tool: 1) *Emergency Communications System Life Cycle Planning Guide,* SAFECOM; 2) *How 2 Guide for Funding State and Local Public Safety Wireless Networks*, PSWN; 3) *Interoperability Business Case: An Introduction to Ongoing Local Funding,* SAFECOM; and 4) *Fiscal Year 2011 SAFECOM Guidance on Emergency Communications Grants*, SAFECOM. These publications are available for download: http://publicsafetytools.info

[27] Interoperability Continuum: A tool for improving emergency response communications and interoperability: http://www.safecomprogram.gov/oecguidancedocuments/continuum/Default.aspx

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Recruiting and staffing are also important components of your program. Performance issues under the best of circumstances can be challenging, but take those serving in the roles of COMU positions out of their regular working environments, throw them into an unstable field environment, and the performance expectations increase dramatically. Not everyone who works communications will be productive in an incident scene. An ICC is no place for the untrained, unwilling, and undesirable. It is critical to maintain the best pool of Communications Unit position-specific resources, employees, and candidates possible. If you do not have the best of the best available, no one is going to request them.

Paths, Roads, and Routes toward Training, Exercises, and Staffing

What type of training is available, how do you acquire it, and how much will it cost? How many should be trained, who should be selected, and who is going to train them? What happens after training and how do they maintain their new or enhanced skills and abilities? The answers to these questions are moving targets.[28]

Developing a proactive application and selection strategy that addresses both short- and long-term needs increases your ability to reach program goals. While a challenging task, **recruiting** is one of several factors in the planning process where you have a great deal of control. Good recruiting starts with having a plan, and that plan should address these four subsequent issues at minimum: 1) capacity and need, 2) timing, 3) methods, and 4) potential roadblocks.

Over time, the number of initial training classes needed to maintain the desired staffing allocation should decrease. Include succession planning in your lifecycle figures to determine the number and type of classes you need annually, and to provide the foundation for developing a multi-year training plan. Consider involving cross-jurisdictional and cross-disciplinary elements in all position-specific COMU training and exercises.

Currently the only DHS-recognized All-Hazards ICS Communications Unit position-specific training is for the COML and COMT positions. There are some locally or state-recognized training programs for RADO in the form of Incident Dispatch Teams (IDT), some in-house programs for INCM and Communications Coordinator (COMC), and training developed by independent vendors. OEC has developed COML and COMT Train-the-Trainer (TtT) and AuxComm courses. FEMA endorses the COML TtT and COMT TtT courses and the AuxComm course is NIMS/ICS-compliant. Training is available from DHS through the ICTAP program and a limited number of contractors. As funding becomes available to DHS, additional courses may be developed.

The SWIC, STO, State ESF2 Coordinator, or other designated official should be included in all training development. State or local entities that develop ICS All-Hazards Communications Unit position-specific training should share this information with the SWIC, STO, or ESF2 Coordinator. This promotes opportunities to share the program with the NCSWIC, review it for potential use as the foundation for developing NIMS ICS

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[28] Information on available training for all the COMU positions listed in this guide is available online. Monitor these sites for information on the availability of existing and new courses:
- SAFECOM Program: http://www.safecomprogram.gov/library/lists/library/DispForm.aspx?ID=328
- DHS: http://www.dhs.gov/files/programs/gc_1286979768422.shtm;
- FEMA online course catalogue: www.training.fema.gov;
- Current EMI course schedules: http://training.fema.gov/EMICourses.

All-Hazards training, and consider its potential submission to FEMA for review and inclusion in the state training catalog.[29]

Position-specific training is required for those who become recognized in the ICS Communications Unit positions. The feedback from the reporting states is very positive for existing COML and COMT training. Several states recommended developing awareness-level training for those who may not become deployable but who have communications responsibilities, such as Public Safety Answering Point (PSAP) supervisors, emergency management directors, and Incident Commanders. These individuals, and the incidents they support, can still benefit from awareness information about COMU functions and the roles and responsibilities of unit positions. In absence of awareness-level training, these personnel are being sent to COML training because it is considered good training regardless of whether or not they will be recognized.[30] DHS has developed on-line Communications Unit awareness-level training: http://www.publicsafetytools.info/training/start_comu_v1.php.

COMU Position Descriptions

The following information is specific to each of the Communications Unit positions recognized in the ICS as it may exist in one or more states at the local, regional, and/or state level (Figure 1).
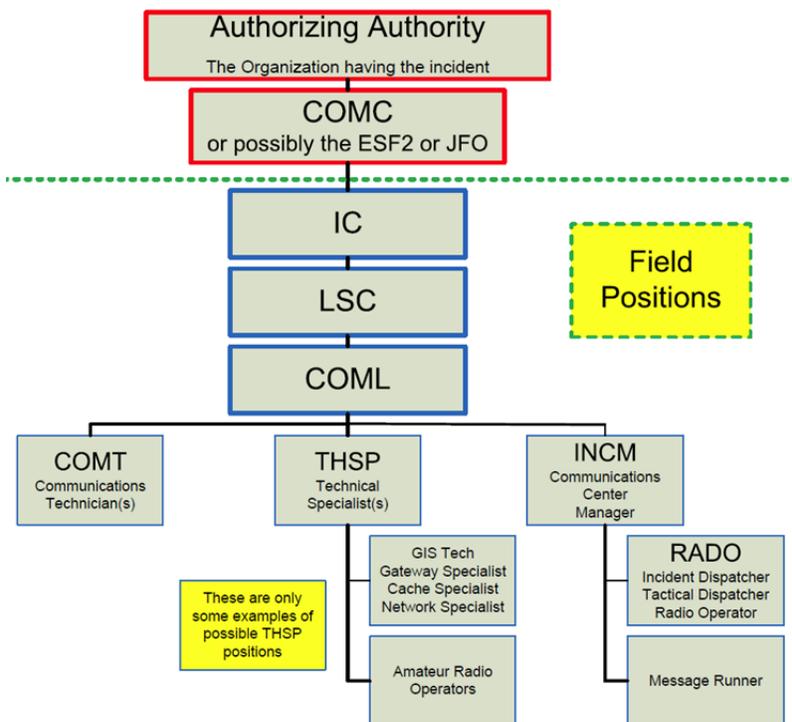
Figure 1: Communications Unit Positions and Relationships

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[29] https://www.firstrespondertraining.gov/rtdc/state/
[30] "Recognized" and "certified" are two of the more common terms that states are using to indicate personnel have achieved a required minimum level of training and experience. In some states, "certified" has a legal connotation implying a guaranteed level of knowledge, skills, and abilities.

■ **COML.** The Communications Unit Leader plans and manages the operational and technical aspects of the communications function during an incident or event. The COML's responsibilities include: develop plans for the effective use of incident communications equipment and facilities; install and test communications equipment; supervise the ICC; distribute communications equipment to incident personnel; and maintain and repair communications equipment.

As for all ICS positions, the COML is responsible for the duties of organizationally subordinate positions until he or she delegates them to others (INCM, COMT, THSP, RADO, etc.). When unit leaders do not delegate responsibility, they assume it. As the COML delegates duties, he or she must also maintain a span of control by overseeing duties they have assigned.

The COML class targets all Federal, state/territory, tribal, regional, and local emergency response professionals and support personnel with a communications background.

■ **COMT.** The Communications Technician is a professional responsible for supporting the technical activities of the Communications Unit, such as radio/system coverage, radio programming, maintenance and repair, telephone service to the incident, data access, and gateway management. This position is critical for implementing technical assets. It:

- Supports the technical implementation of incident communications systems

- Actively assigns and processes equipment distribution

- Tracks equipment and trains operators on equipment use

- Tracks programming levels of equipment

- Understands the complexity of emergency and disaster deployments.

The COMT class targets Federal, state/territory, tribal, urban, local, and emergency response professionals, and support personnel in all disciplines with a communications background. The class focuses on those who have technical aptitude but who may not have strong technical experience.

■ **INCM.** The Incident Communications Center Manager is essential to the smooth and efficient operation of an ICC. "The Incident Communications Center Manager position is filled when the COML's span of control would be exceeded either by the complexity of the incident, requiring an unusual degree of involvement in incident action planning, or by the number of technicians and radio operators assigned to the unit. The INCM serves primarily to supervise radio operators and manage the increased complexity of an ICC during large incidents."[31]

The INCM will often assist the COML in cache management, recordkeeping, etc. This position is critical for managing the RADO staff, who are often from disparate agencies and jurisdictions.

INCM classes should target Federal, state/territory, tribal, urban, local, and emergency response professionals, and support personnel in all disciplines with a communications

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[31] See footnote 6.

background. This class should focus on those who have strong supervisory and operational aptitude.

Standardized NIMS ICS All-Hazards INCM training is not currently available from the same sources as COML and COMT training. Wildfire INCM training is available from the National Wildfire Coordinating Group (NWCG).[32] There is a job aid and PTB available for the NWCG INCM position. The Telecommunicator Emergency Response Taskforce (TERT) provides standardized TERT Leadership training to recognize TERT Supervisors and Team Leaders for those who are "properly certified by the authority having jurisdiction (AHJ) that the individual has the requisite training and skills of a Supervisor."[33] At the time of this guide, these were the only standardized classes identified.

■ **RADO.** The Radio Operator staffs a radio at the ICC and is responsible for documenting all radio and telephone messages. Other duties may be required, including documenting all calls, filing documentation, radio check-out/in, equipment checks, etc. The RADO's immediate supervisor is the Incident INCM who manages the ICC. In the absence of an INCM, the COML will supervise the RADO position. Often the COMT requests assistance from the RADO to help clone and check-out radios. Unlike the COML and INCM positions where there is one per operational period, there could be from one to eight or more RADOs in the ICC. This will depend on several factors, including whether the incident is operating with day and night operational periods, if there are multiple jurisdictions and public safety disciplines involved, as well as the complexity and size of the incident.

Some local agencies have trained public safety radio dispatchers as Fire Incident Dispatchers (Fire IDT), Tactical Dispatch Teams (TDT), or All-Hazards Incident Dispatch Teams (IDT). These teams bring additional training and experience to an incident and are deployable resources for an ICC.[34] TERT dispatchers or telecommunicators who normally directly assist a PSAP may be deployable as RADOs depending on the state, regional, or local Communications Unit recognition criteria.

In the all-hazards environment, experienced communicators will be more effective than field personnel pulled from the ranks of on-scene responders. The RADO is essential to the accuracy and timeliness of all radio and telephone communications going into and out of an ICC. As such, this position is critical for the coordination and smooth operations of the ICC. There can also be a benefit to having RADOs work directly with command or general staff in Emergency Operations Centers (EOCs) and assist with status, check-in, and recording.

RADO classes should target Federal, state/territory, tribal, urban, local, and emergency response professionals, and support personnel in all disciplines with a communications background. This class should focus on those who routinely perform as public safety radio dispatchers and have strong operational aptitude.

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[32] The NWCG is widely recognized for conducting wildland fire-relating training for ICS positions. Although not all-hazards-oriented, the job aids written for many of the positions can effectively provide a foundation for the key knowledge, skills, and abilities for positions that still need all-hazards training programs written: www.nwcg.org

[33] "TERT involves a comprehensive program that includes assistance to individual states in developing programs that would lead to the establishment of predetermined and selected trained teams of individuals who can be mobilized quickly and deployed to assist communications centers during disasters." www.njti-tert.org

[34] http://incidentdispatch.net/

Standardized NIMS ICS All-Hazards RADO training is not currently available from the same sources as COML and COMT training. Wildfire RADO training is available from the NWCG.[35] There is a job aid and PTB available for the NWCG RADO position. Incident and Tactical Dispatcher training for single discipline and all-hazards is available through some individual state, regional, and local programs, as well as through a limited number of vendors.[36] In 2012, limited standardized classes were identified.[37]

■ **THSP.** Certain incidents or events may require the use of THSPs, who have specialized knowledge and expertise. THSP is a "catch-all" position that allows for the formal incorporation of personnel who may not be "recognized" in a specific NIMS/ICS position: Telephone and Computer Technicians, Interoperability Gateway Specialist, Mobile Communications Center Specialist, Cache Radio Specialist, GIS Specialist, etc. Valuable THSP services also include various amateur radio organizations located throughout each state.[38]

Technical Specialists generally receive their specialty training as part of their regular employment or via volunteer organizations. However, other training may be required for recognition and deployment, such as ICS courses including NIMS awareness training and other responder training as designated. Members of the amateur radio community who respond during emergencies will benefit from taking the AuxComm course. The awareness training enhances the operator's existing knowledge as it relates to public safety. The course focuses on auxiliary communications interoperability and the relationship between the COML and the volunteer.[39]

THSPs may be assigned wherever their services are required. In the all-hazards environment, no one person can be a complete expert in every possible scenario. Because the THSP is essential to providing unique services that existing agency staff may not possess, this position is critical for the coordination and smooth operations of the ICC and the Communications Unit as a whole.

THSP classes should target Federal, state/territory, tribal, urban, local, and emergency response professionals, and support personnel in all disciplines with a communications background. This class should focus on those who have clear aptitude and extensive experience in their professional area of expertise.

Standardized NIMS ICS All-Hazards THSP training is available through the OEC ICTAP technical assistance request process. Depending on the specialty, profession-based, agency-sponsored training likely exists as well. Outside of providing ICS and NIMS courses to responding personnel, developing NIMS ICS Communications Unit position-specific training courses for the multitude of THSP positions would not be fiscally prudent. The key to successfully deploying THSP personnel is a matter of developing

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[35] NWCG: Radio Operator (RAD0) J-158: http://www.nwcg.gov/pms/resources/J-158.pdf
[36] See footnote 6.
[37] In 2005, a standardized All-Hazards Incident Dispatcher Team curriculum, administered by the Florida Fire Chiefs Association, was taught regionally throughout Florida under an Office of Domestic Preparedness (ODP) Grant for Telecommunicator Training: 05DS-2N-06-58-01-370.
[38] Information on the OEC/ICTAP Auxiliary Communications Workshop (SPCL-AUXCOMM) technical assistance offering: http://www.dhs.gov/files/training/gc_1287084689081.shtm.
[39] FEMA *Fact Sheet,* revised March 2007, "IS-700 NIMS Awareness Training: Who Must Take It, What It Covers": http://www.fema.gov/pdf/emergency/nims/ics_700_fs.pdf

databases of personnel with the needed THSP skills or including these personnel in a Mobilization Guide (MOBGuide).

■ **MsgR.** When other communications options become overloaded or fail, using Message Runners can be a viable option to communicate important information. Depending on the situation, a RADO may become an MsgR to expedite the delivery of critical information.[40] Under NIMS, plain language is used except in military-level situations in which coding and signaling may be used. NIMS awareness training and local training to understand the use of the ICS General Message form may be adequate to successfully use this position.[41]

■ **POC/COMC/CDO.** One of the most important officials the COML must contact is the communications point of contact (POC). This is not in the COML's line of authority. However, these are relationships the COML has with external communications structures.

This is an unofficial title, and the actual POC may have one of a number of different titles, such as the Communications Coordinator (COMC) or Communications Duty Officer (CDO). Locally, the communications center manager, dispatch center supervisor, or local frequency coordinator may function as the communications coordinator and coordinate local and regional communication assets. *Do not confuse this with the NIFC Communications Coordinator assigned by NIICD.*

The communications POC is responsible for maintaining contact with all the local agencies that use radios and may potentially have to work together at some point on an incident. The communications POC will collect information about local resources to aid the COML and help with such tasks as assigning equipment, frequencies, and following up on and keeping track of the status of orders. The communications POC must monitor adjacent incidents using similar resources and units that pose potential interoperability problems. The communications POC must also verify the incident location and maintain knowledge of local equipment availability, such as pre-positioned equipment, cache locations, and equipment given to shortage. The communications POC will ultimately determine the extent and availability of communications coordination possible for a given incident.

The communications POC/CDO/COMC helps with:

- Equipment assignments

- Frequency assignments (repeaters, links, aircraft, tactical)

- Status of orders (pre-orders, equipment ordered, when ordered, estimated arrival time)

- Adjacent incident information (interoperability issues, frequency assignments, incident locations, contact information)

- Equipment availability (pre-positioned, cache location, shortages)

- Verifying incident location

- Identifying whether communications coordination assistance is available from other responding agencies.

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[40] See footnote 6.
[41] See http://ics213.com/ for a useful tutorial.

COMC classes should target Federal, state/territory, tribal, urban, local, and emergency response professionals, and support personnel in all disciplines with a communications background. These classes should focus on individuals who possess strong interpersonal communications aptitude, organizational, and coordination skills.

Ways to Obtain Initial Position-Specific Training

You can acquire ICS COMU position-specific training in several ways.[42] Regardless of the method used, instructors teaching DHS-approved courses must themselves be DHS-approved. Confirmation of an instructor's status is available through DHS OEC, FEMA's Emergency Management Institute (EMI), the STO, or SWIC.[43]

COML	On-campus classes held at the EMI in Emmitsburg, Maryland, or EMI-sponsored classes held in any of the FEMA regions.[44]
COML, COMT	State-sponsored Coordination: State organizations seeking to conduct NIMS ICS All-Hazards training classes for their states should first contact their SWIC, who is responsible for notifying the state's respective STO or other designated official.
COML, COMT	Local or UASI-sponsored Coordination: Local or UASI organizations seeking to conduct NIMS ICS All-Hazards training classes for their states must first contact their SWIC, who can notify the state's respective STO or other designated official.
COML, COMT, COML TtT, COMT TtT (Train the Trainer) **THSP (AuxComm)**	OEC-sponsored Coordination: States approved for OEC-sponsored classes through ICTAP will follow a similar process to a state- or locally-sponsored class. ICTAP classes are coordinated between OEC and the SWIC. OEC generally takes responsibility for several of the tasks that are otherwise the responsibility of the instructor.
COML, COMT	Direct contract with a vendor or other DHS-approved instructor.
INCM, RADO, MsgR, COMC	In-house training.

Reporting states indicated the main sources for procuring classes include EMI, OEC technical assistance requests, in-state instructors, and direct contracting with DHS-approved instructors. Unfortunately, due to budget constraints and other factors, very little training is being held in most states. In instances where classes have been held but attendance was an issue, states interviewed reported several lessons learned to improve training attendance for classes:

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[42] Several online sources provide course descriptions, target audience information, and prerequisites, for COMU position-specific training offered by DHS. Monitoring these sites will provide information on the availability of existing and new courses:

- SAFECOM Program: http://www.safecomprogram.gov/library/lists/library/DispForm.aspx?ID=328
- DHS: http://www.dhs.gov/files/programs/gc_1286979768422.shtm;
- FEMA's online course catalogue: www.training.fema.gov;
- Current EMI course schedules: http://training.fema.gov/EMICourses.

[43] In June 2011, the OEC turned over responsibility for maintaining the All-Hazards COML course to FEMA, which also assumed responsibility for maintaining the qualifications process for COML instructors. Previously referred to as "OEC-Approved Instructors," all instructors recognized to teach the All-Hazards COML course then became FEMA-recognized instructors.

[44] Detailed information on the procedure for conducting COML training is located in the "Standard Operating Procedures for OEC-approved Instructors," November 2012. In part, the content of the SOP has been adapted from the FEMA publication, "NIMS ICS Position-Specific Training Program, August 2012" to refer specifically to the COML course. All regional training managers, STOs, and NIMS training coordinators have access to the SOP and can clarify any information that may be inconsistent.

- Use a variety of forums to market classes and exercise opportunities to access the right candidates.

- It is important to pre-register, confirm, and send out reminders to ensure classes have enough students.

- Having people with different experiences to share with the class can improve the value of the course. Some states invite local subject matter experts or local resources such as the National Guard Civil Support Team to showcase local capabilities. This same benefit can be realized when the instructor is familiar with the area they are teaching in and can relate the material in a way the students can see the utility.

- Offer classes to nongovernmental organizations such as Red Cross or to Federal partners that have local offices.

- Offer classes around the state, and take into account seasonal conditions, such as wildfire season, tornado season, hurricane season, etc.

- It is important to conduct classes in both metro and rural locations.

- It is important for states to develop a standard process for advertising available COMU classes to appropriate stakeholders.

Instructor Training

Anyone teaching Communications Unit courses—whether they are the DHS-standardized courses for COML, COMT, AuxComm, or any of the state, regional, or local COMU courses offered for INCMs or RADOs—leaves an imprint that can mean success, challenge, or failure in future performance.

> When it comes to instructors, the mantra should be *quality over quantity*.

A Communications Unit position-specific training instructor has the potential to affect the outcome of an incident or the future of a COMU Program before it even begins. Prerequisites for instructor training beyond qualifications and experience are essential to developing successful instructors who produce successful Communications Unit personnel.

The challenge is to keep instructors in the mix and plan for succession as vacancies occur due to retirements, restructuring in a work unit, transfers, promotions, demotions, etc. If a state, region, agency only has one instructor and something happens, who is in the pipeline?

The COML and COMT Train-the-Trainer courses (COML TtT and COMT TtT) target those individuals who are recognized COMLs and COMTs, and who have completed any additional requirements, including possession of instructor credentials. COML TtT and COMT TtT courses are available through ICTAP as of October 2012. The ICTAP Technical Assistance Catalog contains course prerequisite information.[45] DHS requires newly trained instructors to "adjunct instruct" with a current OEC-approved instructor a minimum of two times and complete an instructor Position Task Book (PTB) during those

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[45] http://www.publicsafetytools.info/ta_request/start_ta_info.php

classes. TERT and the Florida Fire Chiefs Association (FFCA) may provide or have access to instructor and facilitator courses for TERT and All-hazards IDT, respectively.

When states adhere to a process of recognizing *good* instructors, the number of effective instructors ultimately increases, as does the number of effective Communications Unit personnel.

Instructor courses, such as those offered by FEMA, NWCG, or the Police Officer Standards and Training Council (POST), can provide instructor candidates with prerequisites that may be required or with techniques that could improve their ability to be effective instructors.

There is a trend for states to develop in-state cadres of instructors. From a fiscal perspective, having in-state instructors can reduce travel-related costs. From an operational perspective, opinions from the interviewed state officials differ as to whether it is better to develop a local cadre of instructors or use instructors from outside the state, thereby keeping the burden of instructing off those who would be better working in the COMU.

Technical assistance funding may be otherwise committed and some jurisdictions choose to spend the funds to sponsor classes rather than use the technical assistance process. In these situations, agencies can request the same instructors for every class, thereby addressing any concerns about the relationship between the instructors and students and potential inconsistencies in content delivery.

From a learning perspective, existing instructors have observed a positive relationship between instructors who have knowledge, experience, and background of the state they are teaching in, or who are from an analogous state. On occasion, they have observed students are sometimes aloof or intimidated by instructors from other states but are more receptive and interactive with in-state trainers.

From a coordination viewpoint, it can be advantageous to have local instructors at the state's disposal. For some jurisdictions, having only a few recognized instructors is adequate. For others, the need is for many instructors. Instructors need enough practice to remain effectual. If not, there could be costs incurred by the state, region, or local agency to maintain instructor currency.

Not all personnel who have met the instructor prerequisites make good instructors. The challenge with an instructor TtT course is to balance instructor techniques and the delivery of course content. To achieve this balance effectively, DHS has designed the TtT courses to review the course content and discuss lessons learned when delivering each unit. Reporting states also agree that instructor training should not occur immediately after the basic courses. DHS requires instructors to be recognized (possess executed PTBs) before applying to a TtT course.

Application Process and Selection Criteria

It is also important to realize not all good full-time communications staff and technicians will make good Communications Unit personnel. It is not part of the COMU concept to train everyone for field deployment. Response to an incident requires advanced skills that not all personnel possess. These personnel are skilled in their routine positions in the PSAP or radio shop, but may not be at their best in a field environment.

At a minimum, selection criteria should match what OEC and FEMA/EMI already have in place. Some states have added extra requirements, such as submitting a résumé or qualifications. Others have offered priority access to classes they host based on participation in an Incident Management Team (IMT), responsibility to State Homeland Security Region response and planning, State Training Region responsibility, and location in a UASI Region.

> States that have addressed the application process and selection criteria for COML and COMT have taken the DHS prerequisites for existing NIMS ICS All-Hazards Communications Unit position-specific training and customized the language to dovetail with the State's governance structure and terminology, where applicable.

Some additional recommended qualifications for Communications Unit members include:

- Being a current member of a public safety or first responder organization

- Having 3 or more years' experience in public safety or first response

- Being willing to attend local-, regional-, or state-standardized training applicable to the goals and objectives of the state, regional, or local agency's COMU Program

- Satisfactory employee evaluations

- No disciplinary action within the past 6 months

- Being knowledgeable in radio communications and having an in-depth understanding of the most commonly used radio channels in the area to be served

- An interest in serving in a COMU position-specific role at an ICC or other field environment

- Availability to be on-call.

Considerations for a COMU member selection process include:

- Require interested personnel to submit an application or memorandum of interest outlining relevant background and experience.

- Obtain input from field personnel (this is essential in the selection process).

- Evaluate all prospective COMU applicants in a standardized, rated oral interview.

- Evaluate prospective COMU applicants for traits related to a communications field environment and not necessarily to the PSAP environment.

Documentation from existing local and state programs emphasizes the importance of supervisors and field personnel being involved in the selection process. Their involvement is an important factor that lends to the success of COMU deployments. Inviting interested personnel to apply for the COMU increases the likelihood that the unit will provide the best and most dedicated and trusted personnel to handle communications support for any incident.

Staffing Allocation

Determining staffing allocation for communications personnel in a PSAP environment, given certain historical statistics, such as call volume, calls completed per hour, or retention, is one thing. Determining staffing allocation to be on the ready in the event an incident occurs can be more challenging. In a PSAP, staff has full use of their technology and equipment, whereas in a field environment, even with a state-of-the-art communications vehicle, they will likely not be nearly as well equipped. How do you know how many people you need to train and have available for response?

It is likely that the number of COML and INCM personnel needed at an incident will be accurately anticipated. Unless the incident is large, it will likely be one COML and one INCM per operational period. However, the number of COMTs and RADOs required may be more. When considering factors affecting availability of resources (such as vacations, illness, and work schedules), the number of trained or recognized, and on-the-ready personnel will be significantly more than are needed to meet the routine radio dispatcher staffing needs of a PSAP.

Staffing allocation for incident-based communications can be broken into two very broad and inter-related categories:

1. The number of recognized COMU staff needed on an incident.
2. The specific positions and number of individuals for each position that should respond to an incident.

How many personnel need to be recognized is different from how many require training.[46] As of April 2011, statistics show only about 11% of those taking a COML class become recognized COMLs.

Lessons learned by other agencies recommend for the "local jurisdiction to ensure they possess a sufficient cadre of personnel who are qualified to serve as the COML during incident response operations."[47] However, there is no standardized matrix to determine the number of recognized COMLs or other Communications Unit personnel needed. The appropriate number of recognized COMU personnel is a state decision requiring regional and local input. The determination depends on many factors, including the size of the state, the number of incidents, the size and frequency of multi-jurisdiction multi-discipline incidents, and the communications resources available. Many states interviewed, and that responded to the SWIC survey, started with a goal of having one COML per county, or minimally, at least one COML per State Homeland Security region. Some of these states have since reported that this was probably ambitious, but agree it was a plan starting point. From the practical experience gained through deployments, states with more mature programs indicate they are slowly determining what the right number actually is.

The number of recognized instructors needed in each state is also a state decision. As noted, some states plan to build instructor cadres, whereas others will continue to outsource instructor services. Some states have determined they will have a minimum of one trained COML instructor in each of their State Homeland Security regions. This allows

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[46] While not being certified (or even trained) does not preclude a person from filling a COMU position, interviewees agree that deploying certified personnel is preferable and increases the chances of successful communications on an incident.

[47] *Emergency Communications: Developing a Cadre of Communications Unit Leaders,* FEMA Lessons Learned Information Sharing: https://www.llis.dhs.gov/docdetails/details.do?contentID=47833

these states to hold COML training regionally, minimizes travel expenses, and provides an instructor who has local knowledge of communications assets, policies, and practices.

To reach the communications goal established for the program, how many COMU personnel in each position do you need to have available to respond to the expected number of incidents each week, month, or year? Will supply meet demand? Do you have enough COMU personnel available in each position to respond and complete the required work to achieve the overall goal? The primary mistake many emergency response programs make regarding recruiting is that capacity is never reached. Do you know if you can meet incident-based communications needs in a timely manner with personnel currently in place? If not, spend time planning for direct staffing and mutual aid based on likely scenarios. Having a well-defined and -organized mutual aid system reduces costs and improves resource availability without needing to keep resources close by.[48]

For both training and response personnel allocations, documentation and recordkeeping will be essential. It will be important to document the number of personnel trained in each position compared to the number recognized so there are adequate personnel available when needed. After Action Reports are an effective way to gather data to determine if adequate Communications Unit personnel were on scene and the activities were appropriate to their roles and responsibilities. The SWIC can play an important role in tracking the number of trained and recognized COMU personnel in their state.

> As deployments occur, data will be available to improve calculating actual training and response needs.

Continuing Training Opportunities and Exercises

Having states, regions, and local agencies include Communications Unit positions in emergency exercises and planned events serves multiple purposes. It allows experienced personnel to mentor newly trained staff and to sign their Position Task Books. As local emergency responders participate in exercises and planned events that use COMU staff, the value of the staff in incident response becomes obvious and prompts responders to consider COMU staff deployment early in future incidents. Include a communications component to provide continual training opportunities. These opportunities can help staff to maintain their currency in position qualifications and skills, and ultimately improve response capabilities. Participating in planning and executing drills, exercises, and events is another opportunity to evaluate current communications plans and capabilities. Planning and scheduling exercises is challenging with limited resources, but exercise assistance is available through OEC Technical Assistance offerings.[49]

If exercises are developed independently, they should be created based upon current Federal standards available through the Homeland Security Exercise and Evaluation Program (HSEEP).[50] The HSEEP website includes many resources and a template for a multi-year training and exercise plan. Exercise objectives should drill down to the operational level and not focus entirely on the technical aspects of interoperability.

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[48] http://www.fema.gov/pdf/emergency/nims/njti_mrtd.pdf; http://www.cops.usdoj.gov/files/ric/Publications/communicationsics.pdf; and http://www.floridadisaster.org/internet_library.htm#FOG

[49] See footnote 19.

[50] The HSEEP is a capabilities and performance-based exercise program that provides a standardized methodology and terminology for exercise design, development, conduct, evaluation, and improvement planning. It constitutes a national standard for all exercises: https://hseep.dhs.gov/pages/1001_HSEEP7.aspx

Training opportunities abound, including numerous Federal and state emergency management, accreditation, and organizationally-mandated training and exercise requirements, to include COMU positions. Countless events, such as the local street festival, county fair, and college and national sporting events, can support incorporating COMU positions into planning and response activities. However, there is little awareness, coordination, and communication among state, regional, and local agency training officers to ensure that training opportunities are compiled and disseminated to potential participants. This can be accomplished using existing resources such as National Interoperability Information eXchange (NIIX) communities, state intranet calendars, targeted email blasts, outreach lists, etc.[51] There are countless web-based and calendar resources that can make it happen with a little coordination.

ABOUT Recognition and Currency

The terms *qualified*, *certified*, *recognized*, and *credentialed* were discussed at length during the interviews. No single term has been used consistently by practitioners, industry leaders, or regulatory bodies. Those discussions represent another gap in the standardization of a Communications Unit Program. State representatives we interviewed expressed concern over potential liability associated with these labels. For example, some compared *certified* to licensing such as nurses, and others associate *qualified* to firefighting. Both can increase liability exposure that states may not want to carry.

Certified means an individual has met professional standards for training, experience, and performance required for a position. *Qualified* means an individual has met minimum prerequisites and training requirements. For the purposes of this document, we are going to use the term *recognized*. "Recognized" means the AHJ has determined an individual has met all requirements, which can consist of qualifications and certifications, and is deployable.

FEMA NIMS' use of the term "credentialing" means "the administrative process for validating the qualifications of personnel and assessing their background, for authorization and permitting/ granting access to an incident, involving mutual aid between states (interstate)."[52] The FEMA *NIMS Guideline for the Credentialing of Personnel* states: "Credentialing is essential to the emergency management community in that it ensures and validates the identity and attributes (e.g., affiliations, skills, or privileges) of individuals or members of response teams through standards." Credentialing is important to the emergency management community so it can plan for, request, and

> "For an individual/team to be granted access to an incident site by the proper authorizing agent(s), the following three requirements must be presented:
>
> 1. Two forms of photo identification to verify identity, of which at least one of which must be issued by a governmental authority,
> 2. Proof of qualifications/certification, issued by the proper authority as authorized by the State; and
> 3. Authorization for deployment.
>
> Once this information has been provided and approved/accepted, the individual/team may be issued further credentials for site/incident access privileges by the jurisdiction having authority."

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[51] The National Public Safety Telecommunications Council (NPSTC), with the support of the OIC and OEC, is providing NIIX as a free service to the public safety telecommunications community. NIIX offers tools to assist practitioners to collaborate within their organizations to improve the issues facing public safety communications. NIIX provides a centralized, secure warehouse for communications shared with other members within a specific community. Registered NIIX members can access peer-created documents and share information with each other. Members can also use NIIX tools to collaborate in creating and developing their documents: http://www.npstc.org/

[52] http://www.fema.gov/pdf/emergency/nims/ng_0002.pdf

trust resources needed for emergency assistance, receive personnel resources that match requests, and appropriately manage dispatched responders.[53] States can improve deployment and response times by ensuring deployable personnel have the necessary documentation to meet incident access criteria. One option is to issue ID and qualification cards to recognized personnel as part of the recognition process.

Once someone takes a class and goes through the process to be recognized, what happens? There are several different responses to this question. Do you really need to take the class again or take continuing education courses? Are there practical requirements, such as participating in drills and exercises, or must you have responded to a real-world incident? Does someone need to be re-recognized or is the key to validating skills and abilities in a position something else? The key is to stay "current"—current in attributes and privileges, current in knowledge of position duties, responsibilities and authority, current in position skills, etc.

"Currency" can mean the period of time something is valid or accepted. Currency in a position is then the period an individual is valid or accepted to perform in that position as long as they meet the criteria. Requirements to maintain currency do not need to be the same position to position. A national currency requirement for Communications Unit positions does not exist, so it is up to each program to develop currency requirements as part of their SOPs.[54]

Paths, Roads, and Routes toward Recognition and Currency

Common policies, practices, and procedural approaches to successfully implement and maintain Communications Unit Program recognition and currency include:

- Using the OEC ICTAP to request communications-specific exercises (COMLEX), providing opportunities to complete "I" category tasks (indicating the task must be performed on an incident, planned event, or full-scale exercise) and complete Position Task Books (PTBs).

- Use existing qualification systems in each state.

- Engage in program communications with policy-makers to emphasize the need to send people through available classes.

- Adopt a currency criteria and process policy.

Recognition

DHS provides guidance for COML recognition that states can use as a foundation to develop criteria for other positions. States should develop recognition processes for each Communications Unit position.[55] According to DHS, only a state—or AHJ in absence of a state process—should determine whether to recognize a candidate to serve in a position-specific role, and at what level.

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[53] U.S. Department of Homeland Security, Federal Emergency Management Agency Preparedness Directorate; *NIMS Guideline for the Credentialing of Personnel*. Washington D.C., August 2011: http://www.fema.gov/pdf/emergency/nims/nims_cred_guidelines_report.pdf
[54] For example, the NWCG *Wildland Fire Qualification System Guide* outlines various currency requirements for different positions: http://www.nwcg.gov/pms/docs/pms310-1.pdf
[55] FEMA provides credentialing information: http://www.fema.gov/resource-management#item3

DHS provides the following guidance for recognizing COMLs:

- Compile all documentation of meeting the COML class prerequisites. This may include:
  - o prerequisite class certificates of completion,
  - o a résumé detailing management and leadership experience, as well as incident response experience, and
  - o a letter of recommendation from the student's agency.

- Compile documentation of successful completion of the All-Hazards COML class.

- Provide evidence documenting his or her COML experience at incidents or planned events by completing a COML task book.[56]

- Obtain Agency Certification of the PTB.

- Submit the PTB to the AHJ.

Position Task Book (PTB) Process

Position Task Books are an integral part of the "performance-based" system Federal agencies have adopted for emergency response training. PTBs are the primary tools for observing and evaluating the performance of trainees aspiring to a new position within ICS. They allow documentation of a trainee's ability to perform each task, as prescribed by the position. Successful completion of all tasks is the basis for recommending recognition.

> PTBs reflect the A*ll-Hazards* competencies necessary for the ICS positions. This means they are the same across disciplines, whether you come from a background of hazmat, firefighting, or law enforcement.

In order to earn a PTB, a trainee must first successfully complete the requisite training courses for the position. Essentially, the course certificate of completion is nothing more than a "learner's permit."

Steps to recognition involve meeting the prerequisites, completing the course, "initiating" the PTB, sign-off of the PTB, agency certification of the PTB, and submitting the PTB to the AHJ.

State representatives we interviewed expressed concern regarding the differences in recognition processes and what those mean for reciprocation between states and interstate mutual aid requests. The answers to the following questions vary from state to state; however, DHS recommends following the guidance provided in the NIMS ICS COML Course (V2).

Question: Who initiates the PTB?
Answer: The agency head or designee is responsible for issuing the PTB.

Question: Who can be an evaluator?
Answer: Evaluators are anyone in the command structure who can verify the work was satisfactorily completed.

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[56] The *COML All-Hazards Task Book* is available for download from the SAFECOM website: http://www.safecomprogram.gov/currentprojects/comltraining/Default.aspx

Question: How long do I have to complete the PTB?
Answer: A COML student has 3 years to complete the PTB. After 3 years, the task book becomes invalid. The recommendation is for SWICs, the State Administrative Agency (SAA), or other designated governing body to remove individuals with invalid PTBs from their rosters and databases.

Question: Can I use previous experience to complete the PTB?
Answer: Three years' prior incidents can be used as historical recognition to complete the PTB.[57]

Question: When the PTB is completed, who signs it off and to whom should I submit it?
Answer: This is driven by state or local decisions as to who can sign off on PTBs.

Current practices indicate states are handling final evaluator signatures in a variety of ways, including:

- Accepting final evaluator signatures from local Incident Commanders or other appropriate incident participants (such as the Logistics Section Chief or another COML at the incident or event); or

- Requiring that the final evaluator be another recognized All-Hazards COML.

Consensus among those interviewed is that the recognizing agency signature should come from the state, but the appropriate agency varies from state to state. Some states look to the SWIC to fulfill this role. Other states task the state training division, state EMA, or the SIEC with the review of all Position Task Books.

PTBs require signatures from both a final evaluator at an incident or planned event, as well as a signature from a recognizing agency. This indicates the student meets the qualifications and is currently certified. Who the appropriate signatories are for the task book is a policy decision each state must make. Final evaluator signoff can be that of the evaluator who completes sign-off of the last entry in the task book, if allowed by the state, or someone else as designated by the state or another agency with jurisdiction. Some states are adding an additional state-level sign-off by an individual or group of recognized COMLs who review each task book for completeness following submission of the completed book to the state.

In states that do not have a recognition process in place, OEC recommends students compile a recognition packet containing the COML or COMT class certificate of completion, certificates from all prerequisite classes, documentation of appropriate knowledge, skills, and abilities, and a task book for all incidents and planned event experience signed by an appropriate final evaluator. This prepares the student to apply for recognition when or if their state implements a program.

In states requiring the final evaluator to be an All-Hazards COML, additional planning can occur to ensure all trained personnel have opportunities to participate in exercises and planned events in order to get their task book signed off expeditiously. While this method

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[57] "Historical recognition" is a process that provides a means for incident management personnel to receive credit for previous experience, training, or qualifications. They must have either (a) documentation of previous ICS training, education, and experience in an ICS position(s) or (b) documentation of previous extensive on-the-job incident response experience. Historical recognition enables these personnel to be considered as meeting the minimum requirements of this guide in the categories of Education, Training, and Experience for an ICS position(s) until they successfully complete the actual minimum requirements for the position.

does require additional planning and coordination, it also ensures someone who knows the job intimately evaluates students on their performance. Where a state has developed policy, students are better prepared to meet state recognition policy requirements. All Communications Unit positions can benefit from this process.

Currency

A consistent theme among the reporting and interviewed states is the lack of time and resources the SWICs have to develop the processes, practices, and procedures for their Communications Unit Programs. This is compounded by a lack of funding to bring working groups and other stakeholders together to get the tasks accomplished. This issue exists also when discussing the matter of developing guidelines for currency.

DHS currency requirements for the all-hazards positions do not exist. Thus, some states have used the *Wildland Fire Qualification System Guide* as a resource for developing currency requirements.[58] For positions identified in the guide, the maximum time allowed for maintaining currency is 3 years for air operations and dispatch positions and 5 years for all others.[59] In NWCG, you must work as a COML once every 5 years, and in Firescope it is 3 years.

Recommendations from interviewed and reporting states for ways to maintain currency include requiring one or more of the following:

1. By successful on-the-job performance in the position recognized within the given timeframe:
   - a. COML–3 years
   - b. COMT–3 years
   - c. INCM– 5 years
   - d. RADO–5 years

2. By successful performance in a position identified as "other position assignments that will maintain currency." For example: A RADO must be TERT- or IDT-recognized, or be a full-time telecommunicator.

3. By successful performance of additional activities as identified by the AHJ. For example: conducting a predetermined number of outreach activities promoting the Communications Unit functions or participating in continuing education directly related to the recognized position.

Example: A COML can maintain currency by (1) successful performance as a COML, or (2) successful performance as a COMT, or (3) successful participation in one continuing education training each year.

Any communications exercise, event, or incident can qualify. However, it has to have a *significant* communications element. It could be an airshow for example, but there has to be a significant amount of communications tasks to be addressed.

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[58] See footnote 54.
[59] PMS 310-1: http://www.nwcg.gov/pms/docs/pms310-1.pdf. The NWCG course catalog does not list COMU positions such as COML, COMT, INCM, RADO, and THSP as dispatch positions: http://www.nationalfiretraining.net/course_catalog/index/filter/filter.html#

Documentation and Recordkeeping

Some states have reach-back periods and currency requirements, so it is important—not only as for individuals, but also for organizations—to maintain documentation and records. Authorities having jurisdiction are responsible for determining if individuals have the necessary knowledge, skills, abilities, and experience to perform the functions for the positions in the Communications Unit—not the Federal government. Therefore, maintaining records of training, evaluation, and incident response is important.

For NIMS ICS All-Hazards Communications Unit position-specific training, volunteer and instructor training (COML, COMT, COML TtT, COMT TtT, and AuxComm), DHS maintains all training records. These records are available to the SWICs through OEC. However, DHS documents initial training—not continuing education, exercises, or incident response.

In the absence of a national database of recognized responders, some states have been using the Communication Assets Survey and Mapping Tool (CASM) to construct a basic database of available Communications Unit resources.[60] This allows these positions to become a deployable asset just like a piece of radio equipment. States have created master lists in electronic format that are maintained somewhere at the state level. Others keep hard copies or scans of training rosters (both initial and continuing education training) and recognized task books. In absence of State databases, regions and local agencies have developed their resource databases through existing agency training databases and computer aided dispatch (CAD) systems. Another option is to use the NIIX. Some states are adding their lists of Communications Unit resources to their NIIX communities as a database for emergencies, as well notification of training and exercise opportunities. States may also tap into existing emergency management resource databases whatever they may be called (Web-EOC, E-Sponder, EM2000, etc.) and enter all the COMU resources in the state in the database under ESF2.

Coordinators may not be aware of other possible local- and regional-level COMU resources. If a state is planning to develop a database, they can conduct an inventory and accurately account for all potential COMU resources. In the absence of a national process, this places the state in a position of preparedness until COMU position-specific training and guidance becomes available and will provide documentation for historical recognition, as well as reach-back periods.

Even if developing a database is in the distant future, it is essential to disseminate information about COMU resources throughout the PSAPs in the state, as well as all law enforcement, fire rescue departments, and emergency medical services organizations. More information is available in the "About Including All-Hazards Communications Unit Positions into Incident Planning and Response" section of this guide.

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[60] The CASM program collects information about an agency's mobiles, portables, frequencies/channels, base stations, gateways, towers/repeaters: http://www.in.gov/ipsc/2529.htm

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ABOUT Standard Operating Procedures

Agencies encounter operational liability in all levels of response (daily, backup, emergency, and regional) in public safety communications. Very few lawsuits against agencies result from response to unforeseen emergencies or disaster situations; however, the potential for liability is immense. Many people—particularly those who have had basic instruction in the concepts of liability—live in fear of making the "big mistake" that will cost their agency millions of dollars.[61] One way to remedy this problem is to develop, implement, and use standard operating procedures, or SOPs.[62]

SOPs are formal written guidelines or instructions for incident response. They provide the authorities, processes, and procedures for instituting field-deployable Communications Unit personnel. SOPs typically have both operational and technical components and enable emergency responders to act in a coordinated fashion in the event of an emergency. This section of the guide addresses the operational component that functions through the human elements of coordination and use of resources.[63]

DHS maintains, and practitioners agree, that it should not be its responsibility to mandate to the states SOPs relating to COMU personnel training and deployment—except where national standards can benefit the states. OEC and FEMA/EMI, through its practitioner-working group, developed minimum qualifications for COMLs, COMTs, and instructors, minimum required experience through the Position Task Books, minimum class curriculum, and a policy for requesting trained instructors until states have developed their own instructor resources. All other policy falls to the states, regions, and local agencies, as the nature of a response dictates. If they exist at all, SOPs vary in form from informal, unwritten agreements to formal, fully documented SOPs.

Paths, Roads, and Routes toward Standard Operating Procedures

SOPs provide roadmaps to where you are going and give you the directions on how to get there. Incident Commanders and Logistics Section Chiefs can focus on their roles and responsibilities a little easier, knowing everyone is using the same roadmap and headed for the same destination.

Agencies may find that SOPs based on what the agency has always done will not stand up to critical examination. It is helpful to review TICPs created by other regions to assist you in your efforts. SOPs from other states, regions, and local agencies are available through NIIX and from several states.[64] The *ICS Communications Unit Program Development Activities by State* supplement referred to in Part 2 of this guide contains additional guidance.

If your state does not have SOPs in place, introducing them, especially on a statewide basis, can be a complex and frustrating process. Resistance is inevitable, although involving users and other stakeholders early in the process can help overcome it. An

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[61] Sarah Miller, "Operational Liability in 911 Communications Centers," Jacksonville State University, *Legal Issues in Public Safety Communications* (PST312), 2004.

[62] Some prefer the term "Standard Operating Guidelines" (SOGs) over SOPs to allow for flexibility. During response, "procedures" may be too rigid and not fit the type of event. SOGs make suggestions for possible operations but allow individuals in charge some flexibility in decision-making.

[63] Two SAFECOM resources offer guidance on developing SOPs that address the technical components: http://www.safecomprogram.gov/library/Items.aspx?CATID=Interoperability Basics and http://www.safecomprogram.gov/oecguidancedocuments/webpages/ts.aspx

[64] The DHS statewide interoperability planning guidebook includes guidance for writing SOPs. See footnote 9.

effective method for distributing and documenting changes is critical to make sure everyone is operating off the same policy.

SOPs become obsolete if they do not undergo regular review and update. Therefore, you will need an SOP that defines how and when to update the procedures. An annual review of every procedure is generally a good idea. However, if this is not operationally realistic, the review period should not exceed 2 years. Some states are completing reviews in conjunction with the SCIP or TICP review and update cycle.

SOPS need to be comprehensive enough to address a variety of circumstances, but not so elaborate and detailed they become complicated to the point the users spend more time trying to figure out the SOP instead of completing the necessary tasks. Users generally need more guidance for those tasks not experienced on a day-to-day basis. However, incorporating those types of common tasks into an SOP or checklist for the backup, emergency or regional operations, users will have more success in completing the tasks correctly. For complex situations, consider a DO-CONFIRM or a READ-DO checklist to guide users through the steps needed to complete critical or time-sensitive tasks.[65]

SOPs can be either stand-alone or contained within a Communications Unit Program Plan or other master document such as a TICP or SCIPs. They can include:[66]

- Governance or decision-making structure
- Training
- Recognition and currency
- Responsibilities of COMU positions
- Uniform and equipment specifications
- Call-out and response procedures
- Methods of accountability
- Establishing an ICC
- Incident-based responsibilities
- Communications Unit personnel integration (current and future positions)
- Demobilization
- Compensation
- Mutual aid parameters.

Common policies, practices, and procedural approaches to successfully implementing and maintaining Communications Unit Program SOPs include:

- Engage in a development process that results in well-researched, well-designed, well-written, well-trained, current, and accurate SOPs.

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[65] Atul Gawande, *The Checklist Manifesto – How to Get Things Right*, 2009. With a DO-CONFIRM checklist, team members perform their jobs from memory and experience, often separately. But then they stop. They pause to run the checklist and confirm everything that was supposed to be done was done. With a READ-DO checklist, people carry out the tasks as they check them off—it is more like a recipe. For any new checklist created from scratch, you have to pick the type that makes the most sense for the situation.

[66] The DHS statewide interoperability planning guidebook indicates SOPs should include the requirements and responsibilities of the COML position, establishing an ICC, and the INCM position. See footnote 9.

- If a process is working for one COMU position, use it as an outline for others.

- Bring the right people to the table; when a subcommittee brings an SOP to the governing body (i.e. SIEC), there should already have been several sets of eyes on it from all the regions to make sure it is current and valid and can be broadly interpreted throughout the state.

- Follow existing DHS requirements, including developing SOPs in compliance with NIMS and ICS.

- If SOP committees cannot meet in person, use on-line and telephone collaboration tools.

- Get existing COML, COMT, INCM, RADOs, and volunteer groups involved and use them to vet draft SOPs.

- Find an agency that has SOPs in place and duplicate them; do not reinvent the wheel.

- There are varying levels of interoperability, so do not rely on one approach.

- Acquire a planner or share one on a temporary basis with other agencies to develop initial SOPs.

- Update SOPs minimally every 2 years, but address any situation in AARs in a timely manner.

- Next time you update your SCIP, TICP, or both, incorporate COMU information.

- Even if you are not able to act on them right away, include developing operating procedures and processes as initiatives and elements of strategic planning.

- Establish an on-line repository for SOPs.

- Establish an SOP subcommittee responsible for developing and disseminating SOPs.

- Use exercises to validate SOPs.

ABOUT Including All-Hazards Communications Unit Positions in Incident Planning and Response

Historically, incident AARs do not show well when it comes to integrating communications into incident planning and response. The advantages of incident-based communications are recognized; however, there is a gap in getting Communications Unit personnel integrated into incident planning and response. Both are substantial challenges with the greater of the two gaps being in the area of response. Reporting states expressed frustration at the challenges faced when it comes to getting COMU personnel requested and deployed at the local, regional, interstate—as well as intrastate—levels.

Once COMU personnel are trained, it is important to market their skills in the responder community. If nobody is aware that the resource exists, how to acquire the resource, or what to do with the resource once it arrives, then there has been no improvement to incident communications. When developing a Communications Unit Program, develop policies for requesting and deploying COMU personnel (including requirements and limitations), mutual aid (including Emergency Management Assistance Compact [EMAC] requests), reciprocation of recognition, liability factors such as self-deployment, and cost.

Also, address policies such as mutual aid and reciprocation of recognition regionally with neighboring states.

There are several ways to socialize Communications Unit resources into the state, regional, and local incident planning and response culture. These include, but are not limited to:

- Include in exercises and planned events.
- Develop and update SCIPs and regional TICPs.
- Include in IMTs.
- Leverage the SWIC.
- Educate Incident Commanders on the capabilities of the COMU

Including COMU positions in incident planning and response should be an automatic process—consider issues with compatibility and equipment standardization during incidents, or communications problems (technical or operational) that are reported during responses. These situations can be resolved if trained COMU personnel are dispatched to handle communications.

Request, Deploy, and Integrate Communications Unit Personnel

Sometimes the most effective marketing takes place during and immediately after a significant emotional event such as 9/11, the Tennessee/Kentucky ice storm in 2009, or the floods in 2010 and 2011. Outside of those types of events, in order to establish incident-based communications in a timely manner, states should develop policy that directs how to integrate the Communications Unit into all levels of response planning. This policy is directed to SWICs, statewide interoperability governance boards, regional interoperability boards, and other response planners.

Market the availability and value of a COMU response to an incident or planned event, and include unit personnel in exercises and events. To ensure that COMU personnel are recommended for deployment upon notification of an incident that requires communications resources, develop TICPs and include COMLs in IMTs. Be sure that SOPs for requesting, deploying, and integrating COMU resources into an incident address local, regional, interstate, and intrastate responses.

As local emergency responders participate in planned events and exercises using COMU personnel, the value of the COMU in incident response becomes more obvious. Homeland Security Grant Guidance for Fiscal Year 2005 required all UASI regions to develop a TICP and to have trained COMLs to support equipment deployment.[67] The TICP development process fosters local and regional outreach, planning, and

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[67] Department of Homeland Security, Office of State and Local Government Coordination and Preparedness Office of Domestic Preparedness. *Fiscal Year 2005, Homeland Security Grant Program: Program Guidelines and Application Kit* Version 2.0, Washington D.C.: December 22, 2004.

communication among stakeholders that will encourage the use of the plan during an incident and calling upon a COML to implement the plan.[68]

The SWIC typically is responsible for ensuring regions and local agencies within the state understand the interoperability resources available to them. OEC recommends each state task their SWIC with educating emergency responders about the role of the Communications Unit, the process for requesting unit personnel within the state, and introducing local agencies to unit resources within their region. Federal guidance recommends each state appoint a SWIC. OEC also recommends the SWIC develop a relationship with the SAA, the State Training Coordinator, and the State NIMS Coordinator, as well as the STO. Preparing recommendations for the number of needed Communications Unit positions in the state and maintaining the list of trained unit personnel may fall to the SWIC. Planning and coordinating COMU training within a state should likely be the responsibility of the State Training Coordinator. Ensuring funds are available for training and instructors are the responsibility of the SAA. Ensuring consideration of COMU personnel in exercises and planned events likely falls to the NIMS Coordinator.

States are accomplishing marketing of Communications Unit personnel through:

- **The SWIC** – The SWIC serves as a single point of contact for agencies or regions looking for trained COMU personnel to integrate into their planning. Conversely, the SWIC can also ensure through his or her regular contact with local agencies or regional interoperability groups that the agencies or groups are aware of COMU resources in their area.

- **State interoperability governance structure** – The SIEC or other interoperability governance structure can market the availability of trained COMU personnel in their state through participation in local agency or regional interoperability groups. They can also develop policy about the minimum number and distribution of trained COMU personnel, and their role in interoperability planning and strategic technology reserve (STR) deployment. States should address how to integrate Communications Unit positions in statewide planning and response in their SCIP.

- **The State EMA, Homeland Security Agency, or similar state agency responsible for emergency response** – As incidents occur and resources are requested from the state or regions for deployment, the state or region can recommend Communications Unit personnel be deployed and can recommend specific personnel for deployment based on location and skills. States should develop policy that requires Communications Unit positions be deployed with any State STR, and should recommend regions develop similar policy.

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[68] Through the SAA and SWIC, agencies may request assistance from OEC with TICP development through ICTAP. Department of Homeland Security, Office of Emergency Communications. *National Emergency Communications Plan* Washington: August 8, 2008.

7.3.7 The Requesting PSAP will maintain contact with EMAs and State EMAC Coordinators, as appropriate.
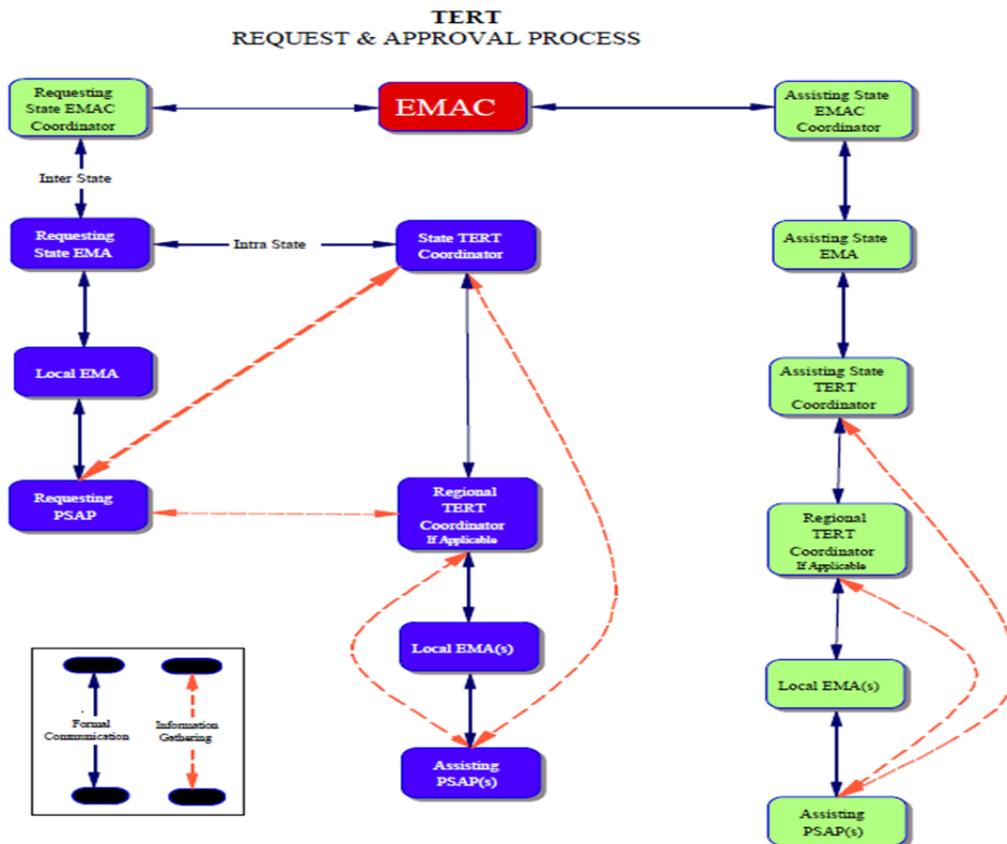
Figure 2: TERT Request and Approval Process

■ **Requests and Deployment.** Interviewed state representatives and other stakeholders have expressed a significant amount of frustration about the lack of requests and opportunities to deploy. Most public safety disciplines work without incident-based Communications Unit support so are just not used to having them. Those that use them routinely swear they would not deploy without them ever again. To close this gap, whether personnel are needed locally, regionally, interstate or intrastate, there are two resource request and accountability systems in place that can be engaged to make dispatching COMU personnel as automatic as dispatching a police officer to a disturbance or a fire engine to a vehicle fire.

In order to deploy trained COMU personnel to an incident, states should develop policies specifying how to request deployment. Some states require regional policy development to dictate how to request a Communications Unit resource at the regional level first; then the state develops complementary policy expanding the process to go beyond the region when a regional resource is not available. Policy should describe who maintains the list of COMU resources in the state and the procedure for requesting the COMU resource. States should also consider how to manage requests for COMU positions from across a state border. Figure 2 demonstrates the request and approval process used for TERT.

> If you implement a criteria-based dispatch protocol that begins in the call-taking phase, the question of when to request and deploy COMU resources becomes a nonissue.
>
> If that is not possible in the short term, here is guidance for PSAPs, dispatch personnel, and Incident Commanders to determine when to suggest or ask for deployment of one of more of the COMU positions:
>
> - When an incident involves multiple disciplines from the same jurisdiction
> - When an incident involves multiple jurisdictions
> - When incident duration is expected to exceed one operational period
> - When more than one radio system is involved
> - When the EOC is activated
> - When the Incident Commander thinks it would be beneficial

Regardless of how large an incident becomes or how long it lasts, all incidents begin and end at the local level. Regardless of the event's scale or complexity, Communications Unit resources can be part of the tiered incident response criteria that dispatch centers use to enter calls for service and determine the appropriate units to respond. The resource request and accountability system that gets it all started is the PSAP's or dispatch center's set of dispatch protocols. It does not matter if an agency dispatch system is managed manually or through a CAD system, a set response criteria exists that the telecommunicator follows to send the right number and type of units to a call based on the call for service information.

A response criterion begins with the call-processing phase, but varies agency to agency. With some upfront collaboration, existing response protocols can be adapted to automatically prompt telecommunicators to request and dispatch any of the Communications Unit positions to a call. A few additions to CAD, if used, may include adding unit identifiers to the tables after determining the response criteria but should not be an overly challenging task. Start simple by determining the criteria for a COML. As deployments occur with the COML, use documentation from the COML's subsequent requests for COMT, INCM, RADOs and technical support personnel to determine additional response criteria for those positions.

Once in place, every time telecommunicators enter or upgrade a call that meets the predetermined set of criteria, CAD automatically recommends the predetermined number of COML, COMT, INCM, RADOs, and AuxComm personnel. This works just like a structure fire, building collapse, or SWAT call out, when CAD automatically recommends a Sergeant, Captain, Fire Marshal, Crime Scene Technician, or other supervisory or specialty unit. These types of units do not go on every call, but when needed, they are recommended automatically so Incident Commanders do not have to think about asking for them. They are included in the system as part of the incident response. With coordination, the predetermined call types and automatic dispatch criteria could be developed and used on a routine basis throughout the state. If local dispatch does not have Communications Unit personnel, they could forward the request to the county or other regional emergency management office depending on how the state is organized. If resources were still not available, supervisors forward the request to the State EMA and the ESF2 coordinator. If still not available anywhere in the state, the state could then activate an EMAC request.

For interstate mutual aid requests, OEC recommends using the EMAC processes and existing cross-border Memorandums of Understanding (MOU).

National Emergency Management Association (NEMA) administers EMAC and provides the day-to-day support and technical backbone for EMAC education and operations.

During times of an emergency, NEMA staff works with EMAC member states to ensure a smooth relay of information passes through the EMAC system to coordinate relief efforts. Agreements are in place for the use of resources between states.

EMAC is greatly under-utilized when it comes to Communications Unit resource deployments, primarily because of lack of awareness of what resources they can request and how to use the system. EMAC can be used for *any* capability one member state has that can be shared with another member state.

The following screen shots show the steps to take to access the EMAC process as long as there is a governor-declared state of emergency.[69]

A number of educational opportunities are useful to learn more about EMAC. Two of these include the EMAC deployment brochure and the *Emergency Management Assistance Compact (EMAC) Preparedness Guide & Deployment Tips for State, Local, & Tribal Public Health and Medical Personnel*. A variety of documents are also available in the EMAC Library. All are accessible from the EMAC website (http://www.emacweb.org/).

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[69] http://www.emacweb.org/?142

■ **Use and Integration.** Similar to an IC, during the first stages of an incident and before more Communications Unit personnel arrive, the first arriving Communications Unit position may have to coordinate numerous activities. The key to success of these activities is response activity SOPs, providing them as checklists, as well as regular practice through ongoing training and exercises with field personnel.

When using COMU personnel during an incident, cost recovery can increase by using improved documentation and required ICS forms right from the beginning. In addition, local deployments, along with advanced mutual-aid and interoperability training, improve the ability of COMU personnel to function in disaster conditions.

Common policies, practices, and procedural approaches that will help you successfully implement and maintain COMU Program inclusion of All-Hazards COMU positions into incident planning and response include:

- Have a well-defined and organized mutual aid system so you do not need to have all resources close at hand.

- Clearly discourage and define consequences of self-deployment; some states do not authorize resource response without state-issued incident mission numbers.

- Educate Incident Commanders and dispatch personnel on all COMU capabilities so they know how to request resources and what to do with them once they arrive.

- Include COMU personnel on state, regional, and local IMTs and other specialty teams such as Urban Search and Rescue (USAR), SWAT, etc.

- Develop and implement automatic criteria-based dispatch of COMU staff at the PSAP and dispatch center level; this reduces deployment time and increases the opportunity for incident command to implement a communications interoperability plan through an incident-based Communications Unit.[70]

- Have response personnel take a COMU awareness course to make provide awareness of what COMU personnel can do for them on an incident.

- Maintain coordination between the ICC and the PSAP communications center; ensure information is flowing back and forth and that Incident Action Plans (IAPs) are shared each operational period.

- Incident Commanders should consider designating a COML during the initial stages of an incident response.[71]

- When a COML is designated, the IC should consider announcing the COML position to all personnel, alerting them to the assigned position and reducing confusion about the COML's role, responsibilities, and available capabilities for field personnel.[72]

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[70] *Emergency Communications: Utilizing a Communications Unit to Implement an Interoperability Plan,* October 2011, available at FEMA's Lessons Learned Information Sharing (LLIS) website: https://www.llis.dhs.gov/docdetails/details.do?contentID=33270

[71] *Incident Command: Designating a Communications Unit Leader at the Beginning of Incident Response Operations*, June 2007, FEMA LLIS: https://www.llis.dhs.gov/docdetails/details.do?contentID=24587, and *Incident Command: Designating a Communications Unit Leader*, March 2007: https://www.llis.dhs.gov/docdetails/details.do?contentID=23377

[72] *Incident Management: Announcing the Communications Unit Leader to All Personnel,* July 2007, FEMA LLIS: https://www.llis.dhs.gov/docdetails/details.do?contentID=26136.

ABOUT Communications Unit Program Planning and Development

It is essential that Communications Unit planning proceed from the premise that the object of planning is inclusive of (1) preparing for the occurrence of an emergency, (2) the actual response to an emergency, and (3) preventing an emergency.[73] When we plan in communications, it is to prepare for the occurrence of an emergency and to be able to respond efficiently to an incident from both a PSAP and field perspective. When we plan in communications, it is so we can prevent the escalation of an already unstable situation into more of an emergency than it already is, due to a communications-related problem.

A common cliché states, "You need to know where you are before you know where to go." **Planning** provides that direction. Engaging in a planning process unifies the efforts of a diverse group of stakeholders for a comprehensive approach; such an approach reduces the negative effects associated with a lack of interoperability and poor communications. By engaging in COMU Program planning, SWICs and other personnel charged with overseeing public safety communications build relationships. As a result, they will be more adequately prepared to deal with all-hazards incidents requiring communications response. Planning will provide the foundation upon which lessons learned translate into mitigation activities, thus allowing the program to develop and evolve. Consequently, future responses are more efficient and effective.

It is not enough to just put a program in place and expect it to run on autopilot. Once a structure is place, there needs to be a plan to develop and/or maintain the program. When focus falters, staff positions change, and turnover occurs, a plan keeps those left in charge with an idea on the destination and possible paths, roads, and routes for getting there. Whether a state uses its own staff or contractors to manage a COMU Program, information on the basic elements of project planning, initiation, monitoring, and accountability will help build a foundation for success.

Paths, Roads, and Routes toward Communications Unit Program Planning

Statewide Interoperability Coordinators and those with communications responsibilities should perform strategic planning and update their plans regularly, annually, and after significant events or technology upgrades. Basic planning guidance and strategies can help.[74]

Strategic planning is an ongoing process of identifying short- and long-term goals. Different governmental decision-making structures need to be considered. Strategic planning should involve disciplined efforts and processes to establish long-term goals and objectives for moving the ICS COMU program forward. Strategic plans should identify stakeholders and decision-making groups; outline goals, objectives, and initiatives; delineate roles and responsibilities; determine required and priority capabilities; develop performance and effectiveness measures; and address sources of funding to improve communications capabilities and preparedness for emergency events.

Engage in a flexible project management process to get your Communications Unit Program started. Doing so can also be valuable when managing complex projects like

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[73] Paul A. Erickson, *Emergency Response Planning for Corporate and Municipal Managers*, 2nd Edition.
[74] *Roadmap for Integrated Justice: A Guide for Planning and Management*, developed by SEARCH, provides information on strategic plans and an overview of information sharing strategic planning: http://www.search.org/files/pdf/StrategicRoadmap.pdf

implementing a state, regional, or even local COMU Program. A COMU Program project could involve building out one of the elements of the COMU, such as governance or SOPs.

The value of building relationships cannot be understated when it comes to planning and the success of a COMU Program. Communications Unit Program planning requires trust, honesty, and an ability to manage hearing the truth when there are lessons to learn that can improve unit response to an incident. It also requires outreach to those who have lessons you can learn from including nongovernmental organizations. Developing relationships takes time and there may be times when relationships are strained, but successful COMU Programs will have strong relationships between the state, regional, and local agencies.

A few states have demonstrated a high level of planning. Arizona, Georgia, Ohio, Minnesota, and Tennessee have methodically approached the process of building a foundation for their respective programs. Some have incorporated existing elements of their programs into their SCIPs, or plan on doing so in the future. This eliminates having to maintain multiple plans and documents. Some are also planning to duplicate processes that work for current positions for others. If planners do not incorporate COMU Program information into the SCIP or TICP, a review of stand-alone plans and documents for updates should occur at least every 2 years. Otherwise, review takes place in conjunction with the SCIP and TICP review cycle.

Common policies, practices, and procedural approaches to successfully implement and maintain Communications Unit Program planning include:[75]

- Executive Management Sponsorship
- Clear Statement of Requirements (scope)
- Clear Vision, Goals, Objectives, Outcomes
- Project Schedule (time)
- User Involvement
- Comprehensive Budget (cost)
- Proper Project Planning
- Realistic Expectations
- Ongoing Communication
- Competent and Engaged Staff
- Proactive Risk Management
- Dedicated Project Manager
- Stakeholder Buy-in

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[75] Two primary sources were used to develop the Decision-Making Structure, Charter, Risk Management and Communications Plan templates: 1) the *Law Enforcement Tech Guide: How to plan, purchase and manage technology (successfully!), A Guide for Executives, Managers and Technologists* (LETG), developed by SEARCH and published by the Office of Community Oriented Policing Services: http://www.search.org/programs/info/publications/techguides/
2) *A Guide to the Project Management Body of Knowledge* (PMBOK® Guide, 4th Edition), published by the Project Management Institute: http://www.pmi.org/PMBOK-Guide-and-Standards.aspx

ROADMAP for the Future

Sustainability is the capacity to endure. Sustainability is more than just funding. Sustainability involves social, economic, and environmental (cultural) challenges that are interdependent.[76] The future of state, regional, and local Communications Unit Programs will ultimately represent the outcome of how leadership approaches the capacity to endure and the ability of stakeholders to adapt to the ever-changing relationships between them.

The aspect of communications that tends to be everyone's focus is technology. However, making technology work requires people—people who know what to do and when to do it, who know where to find what they need when they need it, who have worked and trained together, and who have built trusting, honest, and open working relationships.

Economic outcomes will reflect the strength of relationships stakeholders build and how well they adapt to changes in funding sources. This includes engaging in new processes such as lifecycle planning, identifying and developing new funding sources, consolidating services and resources, leveraging existing revenues, sharing costs, and many others.

Stakeholders have very little control over natural and man-made disasters for which everything discussed in this guide is geared toward preparing to respond. Event analysis has repeatedly demonstrated the best time to influence change is right after a planned event, emergency, or disaster where criticism of response activities occurred. Influence in this area will occur as Communications Unit personnel respond to incident after incident and demonstrate the benefits of integration into the response process.

Paths, Roads, and Routes to the Future

Throughout this guide, we introduced and reinforced the elements and sub-elements of the Communications Unit Assessment and Development Tool. An important component of the assessment and development tool is to identify challenges, failures, successes, lessons learned, and gaps. By identifying gaps, you can set priorities, develop initiatives, and create a roadmap toward the future of your Communications Unit Program.

A forum for the SWICs to share and draw ideas from others did not exist until formal establishment of the NCSWIC in 2008.[77] Communications Unit Program sustainability can be improved as a result of cooperation and collaboration between stakeholders and strategic planning that occurs at regular meetings of the NCSWIC. It is vital for sustainability that all states have a SWIC and be engaged in the NCSWIC.

Information regarding the importance of establishing goals and objectives for a state, regional, or local Communications Unit Program is located in the "ABOUT Communications Unit Program Planning" section of this guide (page 41). Without an action plan for meeting and achieving them, they are nothing more than words on paper. Initiatives support development of each of the Communications Unit Program elements and sub-elements. State, regional, and local agency initiatives represent actions that must occur and establish timelines that will take a Communications Unit Program into the future. Acting on program initiatives helps organizations overcome barriers that previously

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[76] http://en.wikipedia.org/wiki/Sustainability
[77] See footnotes 5 and 13.

made their programs ineffective. Achieving program initiatives allows them to become sustainable.

Initiatives do not need to be complex, as demonstrated by these examples.

Initiative 1: SOP Development

Task: Develop SOPs for Communications Unit Program

Timeframe: Short-term

Priority: Medium

Action Plan:

1. Create an SOP management methodology for all initiatives and projects requiring Communications Unit SOPs.

2. Incorporate current SOPs at state, regional, and local training and exercise events.

3. Promote formal endorsement of the best practice and SOPs at the state and local level.

4. Disseminate, train, and evaluate the common Communications Unit best practices at the state and local level to encourage and promote the adoption of these practices and procedures.

5. Adopt best practices identified at training and exercises as new SOPs.

Initiative 2: Communications Unit Training and Exercises

Task: Incorporate Communications Unit positions into training exercise programs

Timeframe: Short-term

Priority: High

Action Plan:

1. Include Communications Unit positions in a Strategic Interoperable Communications Training and Exercise Plan (SICTEP).

2. Integrate Communications Unit assets into daily usage procedures.

3. Integrate regional Communications Unit assets into everyday communications procedures.

4. Conduct NIMS/ICS and Interoperable Communications training, as defined in the SICTEP.

5. Provide and manage NIMS ICS training for Communications Unit positions, including COML, COMT, INCM, RADO, THSP, etc.

6. Encourage interoperable communications scenarios into All-Hazards exercises.

7. Develop and conduct interoperable communications-focused exercises.

8. Track interoperable communications AARs and improvement plans.

To formalize initiatives, consider turning them into a roadmap to guide COMU activities. Figure 3 is an example of how to condense initiatives into a roadmap of strategic initiatives.
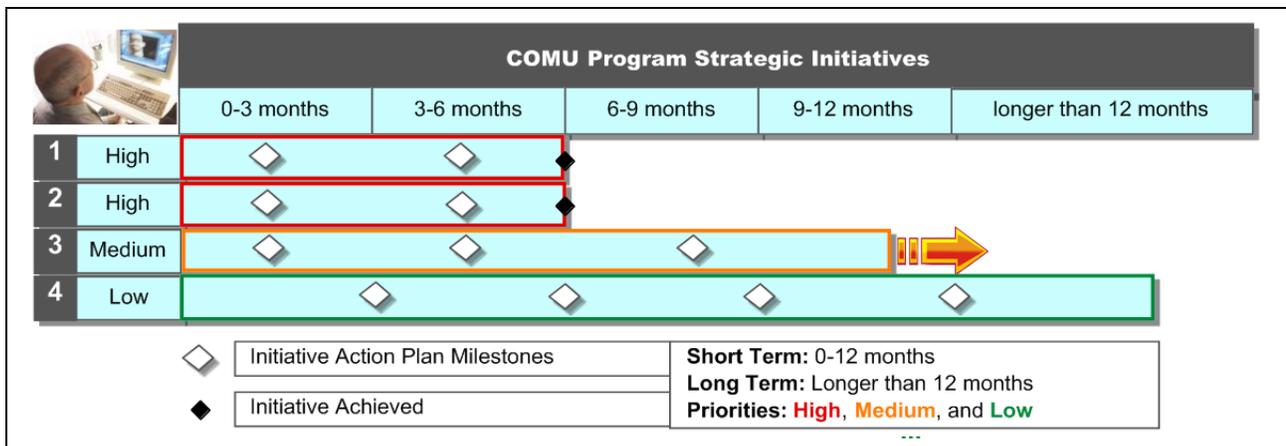
Figure 3: Communications Unit Program Initiative Roadmap

Common identified policies, practices, and procedural approaches for successfully maintaining and developing the future of a Communications Unit include:

- Continue to request technical assistance to help strengthen and promote the All-Hazards COML and COMT positions in each state and encourage developing training for the remaining Communications Unit positions.

- Continue to schedule classes (through technical assistance requests, as one means) to maintain existing momentum.

- Participate in opportunities to respond to requests for comments when documents relating to nationwide or standardized processes are presented.

- Use EMAC to request deployment of recognized COMU resources across states and promote automatic recognition to serve as a resource in another state.

- Request and schedule TtT courses that will help prioritize use of Technical Assistance and build an instructor cadre.

- Participate in opportunities to provide suggestions for formalizing processes:
  o Formalize a process for recruiting potential COMLs and other positions.
  o Simplify recognition processes to help programs move forward at a faster pace.
  o Standardize procurement processes, including pricing, to streamline the process for acquiring training.
  o Formalize descriptions, training, policy and procedure guidance, etc. for the other components of the NIMS/ICS Communications Unit.

- Request planning assistance to help counter the effect that limited staffing and resources have on COMU development.

- Collaborate with stakeholders to coordinate internal state and local functional area COMU position procedures.

- Broaden the target audience for Communications Unit position recruitment:
  o While the majority of 9-1-1 supervisors and telecommunicators will not go on to complete the task book, many have taken the lead and started communications plans for events in their area.

- o Dispatchers need to be familiar with the responsibilities of a COML and know what to do until a COML is involved; COML training improves their knowledge of the technology they are using and ICS. If they do not meet the technical requirements to attend a COML class, dispatchers will benefit from watching the COMU overview video available on the PSTools website: www.publicsafetytools.info

- Identify and evaluate alternative funding sources for providing training; it is unlikely that technical assistance requests alone will be able to meet the demands for sustainment.

- Encourage communication and information sharing.

Takeaways

Here are some final key points to keep in mind as SWICs and those responsible for interoperability and communications continue to make strides toward achieving a Communications Unit Program:

- Establish leadership, a decision-making structure, agreements, strategic planning, and integrate SWICs, SIGBs, SAAs, and STOs as a first step toward building a strong foundation for future development.

- Develop a training plan to schedule and coordinate initial training, recurrent training, and exercises for COML, COMT, INCM, RADO, AuxComm, and other positions.

- Determine and document, in SOP format, processes for recognition and currency.

- Determine and document, in SOP format, processes for requesting, deploying, and integrating Communications Unit personnel into incident planning and response.

- Identify and fill gaps in SOPs (Policies, Practices, and Procedures), formalize them into a SOP guide or manual, and incorporate them into TICPs.

- Engage in lifecycle planning and a process for developing a sustainable funding strategy.

- Engage in a Communications Unit Program Planning methodology.

The best practices recommended in this guide incorporate leadership from state, regional, and local emergency responders. The recommendations identify important considerations in the development of the All-Hazards COML, COMT, and ultimately other ICS Communications Unit positions. However, states, UASI regions, regional planning committees, and local agencies should tailor these recommendations as needed to address their unique needs and circumstances.

Most importantly, the primary message throughout this guide and the key to interoperability is *relationships*. It could be the local responders communicating their need for training; the trained COML leveraging and building relationships to create a TICP; the state leveraging local and regional relationships to draft meaningful SOPs; or practitioners communicating their need for assistance in planning training and standards to OEC. Regardless, relationships are the key to successful emergency communications interoperability and the Communications Unit.

Part 2: ICS Communications Unit Program Best Practices, Tools, and Resources

The current versions of all customizable toolkits and templates are available for download in Word format at www.publicsafetytools.info and www.search.org/products.

ICS Communications Unit Program Assessment and Development Matrix

A supplement to the ICS Communications Unit Implementation and Best Practices guide *and the* ICS Communications Unit Program Development Activities by State

Use this template to assess your Communications Unit Program and subsequently plan for future development and maintenance. It provides instructions on how to use the tool—what to consider, who to engage, and what information to collect—and provides sample performance measures. The tool is customizable to meet specific organizational needs.

Once you have collected the information from the users and stakeholders (SWIC, COMU personnel, decision-makers, etc.), populate the blank Communications Unit Program Assessment and Development Matrix with text and comments. Then review the data to determine areas where challenges exist in your COMU Program, where it failed, or achieved success. The information collected will translate into lessons learned, the opportunity to identify gaps in your processes, and support the evolution of your COMU Program. Assistance is available from ICTAP. For more information, contact your DHS OEC regional coordinator or OEC at OEC@hq.dhs.gov.

ICS Communications Unit Program Development Activities by State

A supplement to the ICS Communications Unit Implementation and Best Practices guide *and the* ICS Communications Unit Assessment and Development Matrix

This supplement provides a closer look at what is taking place around the country with local, regional, and statewide initiatives for ICS Communications. The intention is for it to be a dynamic document that is updated as OEC conducts Communications Unit program technical assistance and as States undertake or achieve initiatives.

ICS Communications Unit Program Sustainable Funding Strategy Tool and Worksheets

An agency can use the template to conduct a lifecycle cost estimate, a review and analysis of funding sources, and develop a funding strategy that can sustain a Communications Unit Program. The template provides instructions on how to use the Communications Unit Program Sustainable Funding Strategy Tool—what to consider, who to engage, and what information to collect—and provides three sample worksheets you can modify to meet specific organizational needs.

The process to develop a sustainable funding strategy can be complex. Do not be overwhelmed by the extensive nature of the forms. Take one worksheet at a time and work through it before moving on. The important thing is not to complete the process immediately. The important thing is to start a process.

ICS Communications Unit Program Plan Outline

The *Communications Unit Program Plan Outline* guides SWICs and other personnel charged with overseeing public safety communications projects through the sections of a COMU Program Plan. The purpose is to help jurisdictions develop a COMU Program that will incorporate COMU positions into planning and response. The content of the COMU Program Plan is able to stand alone or transfer into a SCIP, TICP, or other communications planning document. Additional information related to each section is provided in Part 1 of this guide.[78]

ICS Communications Unit Response Kit

Some states, regions, and local agencies have assembled information and materials into "Go Kits" and assigned them to certified Communications Unit personnel so they are prepared to respond. Access to pre-assembled kits is very useful when COMU personnel face professional and personal stressors at the time of deployment. Several tools are available to help identify the contents and assemble response kits applicable to any COMU-specific position. A backpack, an airtight waterproof case, or a variety of other organizational containers is useful to store and transport these items.

Project Planning Resource Toolkit

The Project Planning Resource Toolkit is a customizable set of templates useful to lay a solid foundation for planning and implementing a Communications Unit Program at the state, regional, and local level. These tools may be helpful when planning your COMU Program implementation project.

Project Charter – This document is the foundation of any project and contains a project description complete with scope, objectives, risks, organization and staffing, a decision-making structure, the project management approach, and initial resource requirements.

Project Plan – More detailed than the project charter, a project plan is a formal, approved document that defines how to execute, monitor, and control a project. It may be a summary of details and may be composed of one or more subsidiary management plans and other planning documents.

Project Decision-Making Structure – The decision-making structure does not necessarily follow rank. The reason we define the decision-making structure is to lay out clear responsibilities and authority, ensure user involvement, and ensure that a designated person officially sanctions the structure.

Project Communications Plan – Not to be confused with an ICS 205, the Project Communications Plan is a strategy to communicate program status and activities to stakeholders, and a method to develop historical records and archives. The SWIC, STO, ESF2 Coordinator, or other person acting as the project manager would create this plan with input from the project team.

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[78] The Communications Unit Program plan outline is modeled after the National Association of 9-1-1 Administrators (NASNA) Model State 9-1-1 Plan: http://www.nena.org/resource/collection/ 22dbdb9d-fbd7-445e-a760-1c39a222ed34/NASNA_Model_State_9-1-1_Plan.pdf

Project Risk Management Plan – Risk management has to be a proactive, ongoing activity. It would be the responsibility of the SWIC, STO, ESF2 Coordinator, or other person acting as the project manager. Create the Risk Management Plan with input from everyone on the team and stakeholders. Create the plan *after* identifying the scope, and continue throughout the project.

Communications Unit Program Assessment and Development Matrix – The intent of the assessment process is to provide an effective relative measure for the status of a Communications Unit Program within a jurisdiction. Do not expect an absolute measure for granular comparisons across jurisdictions; rather, expect to have some idea of relative standing across jurisdictions or progress for a given jurisdiction over time. The quality and value of the COMU Assessment will only be as high as the quality and value of the information entered and analyzed.

Standard Operating Procedure Templates

Customize SOPs to the capability or resource for which they are established. Consider unique characteristics of specific states or participating jurisdictions. For guidance on developing SOPs that address technical components, see the SAFECOM *Writing Guide for Standard Operating Procedures* and *Standard Operating Procedure Template Suite*.[79] To address the operational components of the Communications Unit Program elements and sub-elements, refer to Part I of this guide.

Supporting Plans, Reports, and Resources

This information can help you access existing resources and documents that highlight benefits, define terms, and present viable tools that may provide utility on your quest to further the evolution of your Communications Unit Program:

State SCIPs	To request state SCIP information, contact the SWIC or their designee for the desired state.
Law Enforcement Tech Guide: How to Plan, Purchase, and Manage Technology, Successfully!	http://www.cops.usdoj.gov/files/ric/Publications/lawenforcementtechguide.pdf
Performance Measures	http://www.ncirc.gov/documents/public/Creating_Performance_Measures.pdf
ESF 2 references	http://www.fema.gov/pdf/emergency/nrf/nrf-esf-02.pdf http://www.fema.gov/pdf/emergency/nrf/nrf-esf-intro.pdf
NECP	http://www.dhs.gov/national-emergency-communications-plan
NECP *Capabilities Assessment Guide*	http://siec.wa.gov/success/files/NECP_Capabilities_Assessment_Guidel.pdf
OEC: Current Fiscal Year SAFECOM Guidance of Emergency Communications Grants	http://www.safecomprogram.gov/grant/Default.aspx
National summary for additional reference documents (NRF, NPS)	http://www.safecomprogram.gov/library/Lists/Library/DispForm.aspx?ID=118

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[79] See footnote 63.

Technical Assistance Catalogue, OEC, January 2013	http://www.publicsafetytools.info/start_index.php
Refer to IDT and TERT information	http://www.incidentdispatch.net/ http://www.njti-tert.org/index.php
NIMS ICS *Field Operations Guide*	http://www.informedguides.com/
NIFOG	http://www.dhs.gov/national-interoperability-field-operations-guide
Florida Incident FOG	http://www.floridadisaster.org/internet_library.htm#FOG
COML Mobilization Guide – (PSAP Integration and other sections)	IAFC article: http://www.iafc.org/Operations/LegacyArticleDetail.cfm?ItemNumber=4235 NPTSC article: http://www.npstc.org/docs/newsletter/v8issue2.pdf
Communications Centers and Dispatchers	http://www.911dispatch.com/info/fact_figures.html

Best Practices Interview Participants

The NIEC project team conducted formal and informal individual and group interviews with SMEs who have in-depth experience with Communications Unit operations and issues, and who offered valuable insight. Interviews took place over the telephone and via e-mail. These SMEs assisted the project team in their understanding of various COMU elements. Their appearance on this list in no way implies support for this report or any of its recommendations. We thank them for their time and commitment to effective incident communications.

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Arizona Department of Administration
Arizona Strategic Enterprise Technology
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State of Georgia
Nick Brown
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Division of Homeland Security
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State of Missouri
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Missouri State Emergency Management
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Director, Public Safety Administration
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