

Critical Shortcomings of the Current National Incident Management System Planning Cycle



All-Hazards Incident Management Teams Association White Paper

The All-Hazards Incident Management Teams Association is a 501(c)3, not-for-profit professional association founded in 2010, comprised of incident management practitioners from multiple disciplines representing Federal, state, and local agencies, nongovernmental organizations, and the private sector.

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Position Statement

With this statement, the All-Hazards Incident Management Teams Association (AHIMTA) expresses its strenuous objection to the removal of the All-Hazards Planning Cycle graphic and its explanations from the EMI Incident Command System position-specific curriculum during the curriculum's revision process, and its replacement with the National Incident Management System (NIMS) Planning Cycle and associated graphic. We find replacement of the graphic and its explanations to be unnecessary, confusing, and ill-advised; its exchange does not serve the needs of our tribal, state, and local responder membership and will complicate the training process, since, if the graphic is replaced, incident management team trainees will need to be retrained once they join Incident Management Teams. Having training personnel use a method that does not factually represent the process they will use when managing incidents and events – as will be the case if the graphic and explanation is changed – is not an efficient use of training resources or stakeholders' time.

The Issue

The position-specific training curriculum managed by the Emergency Management Institute (EMI) is currently being rewritten. All-Hazards responders have relied on this training for their Incident Command System (ICS) training since 2008. During this rewrite, the AHIMTA finds that the EMI needs to return to the May 2006 version of the All-Hazards Planning Cycle graphic (AHPC) developed by the subject matter experts who were working for the U.S. Fire Administration (USFA) while developing the All-Hazards position-specific training courses. For over 12 years, the AHPC has been endorsed and/or adopted by numerous training and stakeholder groups as the planning cycle to be used for ICS training. Well over 40,000 personnel have already been trained using the AHPC and associated graphic.

Failure to use the AHPC during the 2021 rewrite will result in critical elements of the planning cycle being underemphasized or lost, or will require significant additional work to try to bridge the gaps between the NIMS Planning Cycle and graphic and what practitioners are actually doing in the field. This will create the dangerous possibility of incident management trainees who use the curriculum missing critical elements needed to develop an accurate Common Operating Picture while in the process of transition/transfer of command. They will also be trained using a method that does not accurately reflect what is practiced by current local, regional, or national All-Hazards Incident Management Teams or the federally managed type 1 and type 2 incident management teams.

Unfortunately, many of the agencies originally involved in the discussions and resulting adoption of the AHPC and accompanying Planning P graphic described in the background section of this position paper have experienced turnovers of their training and development staff to a point where they have lost the necessary institutional

AHIMTA Statement

“The FEMA EMI All-Hazards position-specific training courses must reflect the practices of the stakeholders who are the intended audience for these materials: the tribal, state, and local responders.”

knowledge concerning the shortcomings of the NIMS Planning Cycle and associated Planning P graphic. As a result, they are unaware of the issue and are not working actively to resolve it.

Because of the change in position of the EMI, those who have relied on the EMI's training curriculum will soon be using a curriculum that contains a faulty planning cycle graphic that does not reflect what their members practice.

This position paper is intended to explain to agencies and stakeholders who rely on their personnel understanding the ICS planning cycle the following: the critical differences and shortcomings of the current NIMS Planning Cycle and Planning P graphic; why the AHPC was developed; and why it must continue to be used within the EMI curriculum to train their personnel correctly.

The Issue Background

The original "Operational Planning Period P" was developed by the United States Coast Guard (USCG). Prior to its development, the position-specific "Planning Cycle Guide" developed by FIRESCOPE was commonly used to assist responders in understanding the planning cycle responsibilities and benchmarks necessary to remain on track throughout the ICS incident and event planning cycle. The FIRESCOPE graphical representation of the cycle was formatted as a 24-hour circular clock, but was considered confusing in appearance. The USCG's Planning P format was much more intelligible and user-friendly, but was developed specifically to address the operational environment and conditions present when agencies that derive their authorities from the National Contingency Plan (NCP) manage incidents – most notably the USCG and the Environmental Protection Agency (EPA). Although not present in the original release of NIMS in 2004, the USCG planning cycle was widely circulated as a training graphic and included in one version of the I-300 ICS curricula developed by the EMI.

During the development of the USFA position-specific training courses in 2006, subject matter experts with considerable experience on type 1 and type 2 incident management teams and local government representatives developing type 3 teams began to find multiple issues with applying the USCG planning cycle to the tribal, state, and local All-Hazards environment. The USCG planning cycle did not accurately reflect the differing legal constraints and operational environments experienced by local, state, tribal (in certain cases), and Federal land management agencies of the United States Forest Service, Bureau of Land Management, National Park Service, and the responders within the All-Hazards Community.

After considerable research and review of various versions of the planning cycle, on May 19, 2006, a revised version of the planning cycle and the resulting graphical representation was agreed on. This version was referred to as the All-Hazards Planning Cycle after the broad support of the tribal, state, and local agencies that needed a cycle that aligned more closely with their environment.

In 2006, the USFA and the NFA agreed to its use. It was subsequently used in versions of I-300 developed by the NFA and was the standard during the development of all the position-specific training curricula being developed by the USFA. The AHPC was presented and endorsed by the National Incident Management System Consortium (representing state and local agencies nationwide), a broad spectrum of stakeholders, and the NWCG (the National Wildfire Coordinating

Group, representing the Federal land management agencies and the National Association of State Foresters).

Prior to 2006, the Firefighting Resources of California Organized for Potential Emergencies (FIRESCOPE) used the United States Coast Guard planning process graphic in the 2004 Field Operations Guide (FOG). When the FIRESCOPE organization was made aware of the shortcomings of the USCG planning process that their constituents were experiencing, they endorsed the use of the AHPC and replaced the USCG planning cycle with the AHPC in their 2007 and subsequent FOG publications.

When the All-Hazards position-specific training courses were transferred to the Emergency Management Institute (EMI) in late 2009, the training courses used the AHPC and were supported by the NIMS Planning Process Video, a 45-minute-long DHS-funded video that explained the AHPC in detail. During the transition from the USFA to the EMI, the position-specific training program manager at the EMI agreed that future training courses would continue to use the AHPC.

As a result of this acceptance and adoption, the AHPC and its graphic display, the "All-Hazards Planning P," have been incorporated into, and referred to by, the following:

- The 18 NIMS ICS All-Hazards position-specific curricula housed by the Emergency Management Institute (EMI), adopted for NWCG Command and General Staff position-specific training
- The USFA O-305, Type 3 All-Hazards Incident Management (AHIMT) Introduction course, referenced in the latest NWCG PMS 310-1
- The DHS-sponsored "NIMS Planning Cycle Video" used during the ICS training courses

The 2007 draft of the NIMS refresh reinforced the necessity of using the All-Hazards version of the planning cycle because the language proposed included several critical differences, including the absence of an Agency Administrator's briefing and the Initial Strategy/ Information Sharing Meeting, both of which were considered critical to the transition/transfer-of-command process. All-Hazards Incident Management Teams and the wildland fire-based type 1 and type 2 teams must be delegated responsibility to manage an incident or event and receive a briefing by the appropriate Agency Administrator as part of the transition/transfer-of-command process. Continuing dialogue with the National Integration Center (NIC) staff resulted in an anecdotal reference to the Agency Administrator/Executive Briefing in the 2008 NIMS refresh, but no corrections were made to the other issues identified.

During the development of the draft 2017 NIMS refresh, the AHIMTA and other stakeholders again spent significant time discussing the Planning P graphic with the NIC, in particular regarding the continued omission of critical steps that state and local responders must complete as part of their planning cycle. The AHIMTA and others also attempted to correct several other processes and explanations that did not accurately reflect the process that incident management practitioners currently follow.

One of the impediments to progress was the fact that the NIC staff had experienced a 100% change in personnel since the last NIMS refresh. Significant attempts were made to educate the new NIC staff on the history and issues experienced by state and local responders with the NCP-based

planning cycle and Planning P graphic. The loss of continuity in the NIC staff was evidenced by the repeated omission of the Agency Administrator/Executive Briefing so critical to the wildland fire-based type 1 and type 2 teams and the All-Hazards Incident Management Teams, both of which must be delegated responsibility to manage an incident or event and receive a briefing by the appropriate Agency Administrator as part of that procedure.

The AHIMTA and other organizations endeavored to convince the NIC staff to accept the AHPC as the de facto standard, since it was incorporated into all the coursework and had by then been used to train over 40,000 first responders. The NIC staff working on the refresh opted not to switch the planning graphic, but they did understand that their version missed or did not highlight some critical steps necessary and practiced by the All-Hazards type 3 and the federally managed type 1 and type 2 Incident Management Teams. The omission of the “Initial Strategy Meeting and Information-Sharing Meeting” continued to be identified as one of the critical missing steps, a step that IMTs used as part of the transition/transfer-of-command process. Although the NIC staff did not change the Planning P graphic, they did agree to insert a statement to allay fears that the new NIMS Planning P would disallow the use of the AHPC and the advances made by the AHIMTA and the tribal, state, and local organizations using it. That statement reads:

“The Planning P, illustrated in Figure A-12, is a graphical representation of the sequence and relationship of the meetings, work periods, and briefings that comprise the incident action planning cycle. Other versions of the Planning P may be used as training and operational aids.” (National Incident Management System, Third Edition, October 2017, page 106)

Although many organizations, like the AHIMTA, FIRESCOPE, and USFA, understood that this statement permitted them to continue using the All-Hazards Planning P graphic, the Emergency Management Institute, the managers of the All-Hazards position-specific curriculum, decided they needed to switch to the NIMS 2017 graphic, despite its identified weaknesses for use by tribal, state, and local organizations and despite the statement in NIMS confirming that they could continue to use the All-Hazards Planning P graphic.

During the 2019–2020 time period, a minor revision to the All-Hazards curriculum occurred. This included switching from the All-Hazards graphic to the NIMS graphic. This resulted in developers having to refer to a meeting, the “Initial Strategy Meeting,”¹ that is not labeled as such. This is one of many specific examples in which developers must overcome the inadequacy of using the NIMS Planning P graphic while trying to explain what their audience – the tribal, state, and local Incident Management Team practitioners – actually do on an incident. Additional examples and references follow.

COMPARISON

This section provides specific examples of the differences between the NIMS Planning P graphic and explanation and its All-Hazards counterpart.

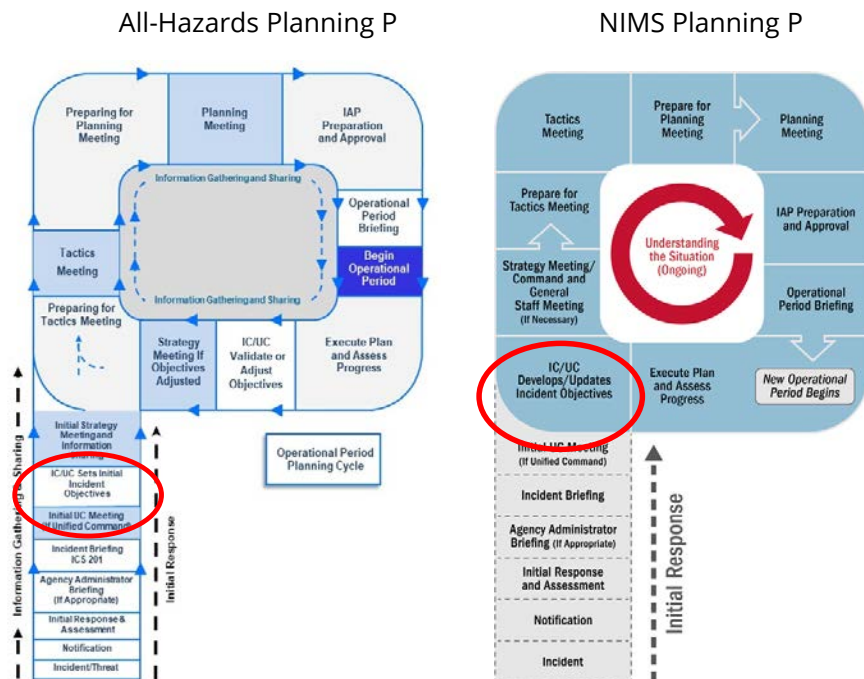
¹ E/L 0962 NIMS ICS All-Hazards Planning Section Chief Course, Unit 5: Initial Response, page 278.

IC/UC Sets Initial Incident Objectives vs. IC/UC Develops/Updates Objectives Meeting

This step is included in the “once per incident/event” stem portion of the AHPC and is called the *IC/UC Sets Initial Incident Objectives*. In the NIMS Planning Cycle, it is called *IC/UC Develops/Updates Objectives Meeting*, but appears in the repetitive portion of the cycle, since it is missing on the stem, and therefore needs to apply to both an initial development and updating.

Why It Matters

The incident objectives should be established before the Initial Strategy and Information-Sharing Meeting or, in the case of the NIMS Planning Cycle, before the Command and General Staff Meeting. Establishing incident objectives is often done at the same time as the Initial UC Meeting if operating in Unified Command. Incident objectives are the core of the direction issued by the Incident Commanders (ICs) when they move to the next meeting displayed in the AHPC. The Initial UC Meeting and the Initial Strategy Meeting work together and result in the entire AHIMT being on the same page with a complete overall understanding of the entire incident, including both operational strategy and support needs.



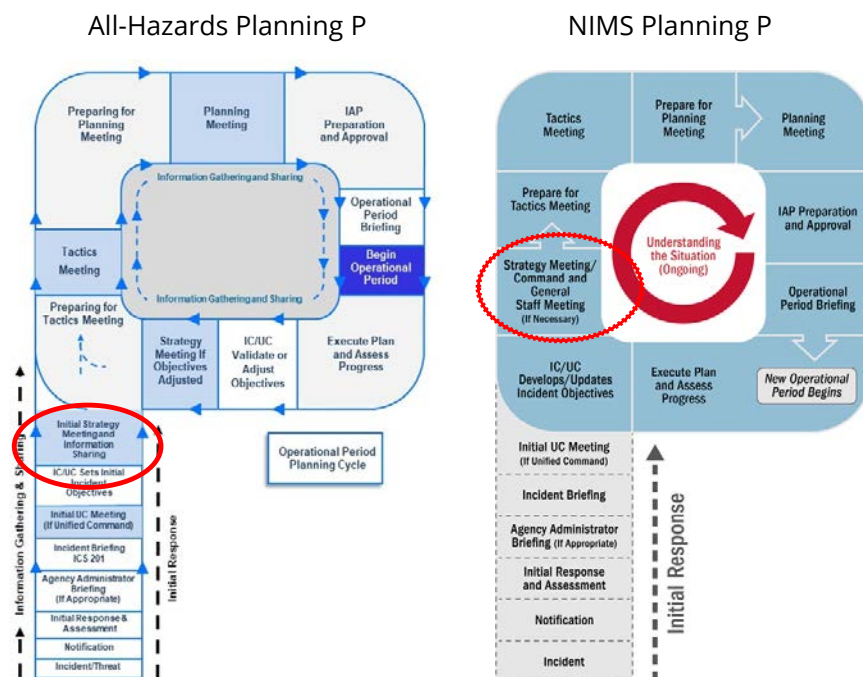
Placing the *IC/UC Sets Initial Incident Objectives* in the stem of the Planning P Graphic allows for the UC to take actions in the initial development of these objectives that are not taken in the subsequent adjustment/updating of these objectives. Placing this meeting in the cyclical section of the Planning P loses this differentiation.

The Initial Strategy and Information-Sharing Meeting

This meeting is included in the stem of the AHPC, but is not indicated in the graphic portion of the NIMS Planning Cycle. Because its omission left a critical gap in the sequence, the Command and General Staff meeting title was altered to include “Strategy Meeting” and an abbreviated explanation was included. However, when the meetings’ titles and purposes were combined, the emphasis and importance of the initial Strategy Meeting and Information Sharing were lost.

Why It Matters

This step is critical for developing a realistic and verified Common Operating Picture that incoming IMTs must gain during the transition/transfer-of-command process. Ground Truthing – comparing what they were told during the Agency Administrator’s Briefing and Initial Incident Commander’s Briefing with what the team members were able to observe, and sharing the Essential Elements of Information (EEl) that each member has collected in the initial phases of the transition/transfer-of-command process – is critical to a team’s success. In addition, during this meeting the Operational Periods are determined and the schedule of meetings and briefings within the planning cycle is discussed to ensure the team is working with a common understanding. This discussion, including setting the timing of Operational Periods and meeting schedules, is critical during the initial meeting, but is not normally necessary at subsequent Strategy Meetings. The critical nature of the *Initial Strategy and Information-Sharing Meeting* and the concept of developing a Common Operating Picture during the transition/transfer-of-command process are the reasons this meeting must be included on the stem (one-time) portion of the AHPC.



The text included in the NIMS *Strategy Meeting/Command and General Staff Meeting* provides insight into the shortcomings of including a discussion of the “Initial Strategy Meeting” as an afterthought, despite its critical nature. The explanation provided in NIMS is also incorrect in including the Agency Administrator (AA) or Initial IC in the list of attendees. In order to gain an accurate Common

Operating Picture for the transition/transfer-of-command process, the team needs to speak openly and honestly about the differences between what they were told and what they observed while gaining their intelligence after their briefings. The abbreviated NIMS description also does not mention the critical items that should be discussed at the initial Strategy Meeting.

Strategy Meeting/Command and General Staff Meeting

After developing or revising the incident objectives, the Incident Commander or Unified Command typically meets with the Command and General Staff, and sometimes others, to discuss the incident objectives and provide direction. This meeting may be called the Strategy Meeting or the Command and General Staff Meeting and is held as needed to determine how best to meet the incident objectives.

The initial Strategy Meeting, which is held the first time through the planning cycle, is particularly important, because it allows team members to share information and jointly determine the initial approach to response operations. The initial Strategy Meeting may include the initial Incident Commander and a representative from the Agency Administrator. (NIMS 2017, page 107)

IC/UC Validate or Adjust Objectives vs. IC/UC Develop/Update Incident Objectives

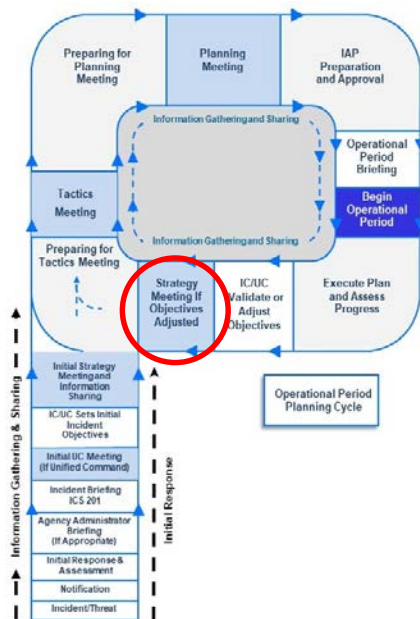
The All-Hazards Planning Cycle and NIMS Planning Cycle address the adjustment of incident objectives differently. The AHPC shows this in the step titled *IC/UC Validate or Adjust Objectives*. In the AHPC the "Development" of the incident objectives has already been accomplished in the stem of the Planning P at the *IC/UC Sets Initial Incident Objectives* step, and then refined at the *Initial Strategy and Information-Sharing Meeting*. This means that "*IC/UC Validate or Adjust Objectives Meeting*" is only necessary if the IC/UC needs to adjust the incident objectives in a way that causes new strategies to be evaluated. This does occur on an incident, but not often enough to require a meeting each planning cycle.

Why It Matters

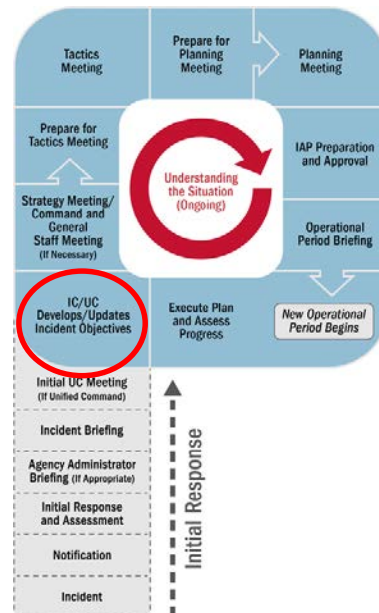
The block of time in the AHPC, "*Strategy Meeting if Objectives Adjusted*" allows for a Strategy Meeting to be conducted on an *as-needed* basis and not as a requirement of the process, as it is on the NIMS Planning P.

The NIMS Planning Cycle depicts this step in the lower left-hand box of the planning cycle and is titled the *IC/UC Develops/Updates Incident Objectives Meeting*. During the initial pass-through of the planning cycle, the incident objectives would be developed, and during subsequent operational periods they would be "updated." Although the AHPC provides for the IC/UC always to validate the incident objectives, a Strategy Meeting is not always necessary, unless the objectives are adjusted. In the NIMS Planning Cycle, the *IC/UC Develops/Updates Incident Objectives* meeting is a recurring meeting in each operational period, rather than an *as-needed* meeting. The NIMS Planning Cycle indicates the IC/UC conducts an *IC/UC Develops/Updates Incident Objectives* Meeting regardless of whether or not the incident objectives and strategies are changed.

All-Hazards Planning P



NIMS Planning P



Command and General Staff Meeting

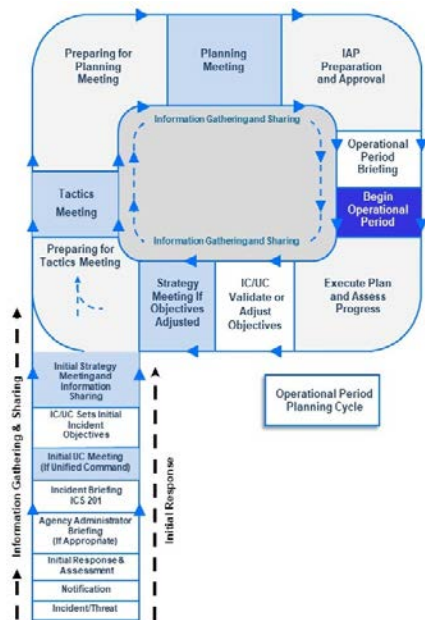
This Command and General Staff (C&GS) Meeting is shown as a required step in the cyclical portion of the NIMS Planning Cycle, but is not required within the All-Hazards Planning Cycle. There is no argument that the C&GS Meeting is extremely important to the successful operation of an AHIMT, but it is independent of the planning cycle. The meeting is used by AHIMT practitioners to address IMT functional and interpersonal issues, work through communication problems, and exchange information to address existing or potential problems. Some AHIMTs conduct this meeting at night, some in the morning, and some even do it over a working lunch. During All-Hazards incidents such as hazardous materials incidents, when operational periods are 4 to 6 hours in length, holding a C&GS Meeting several times each day would be unnecessary and ineffective.

Why It Matters

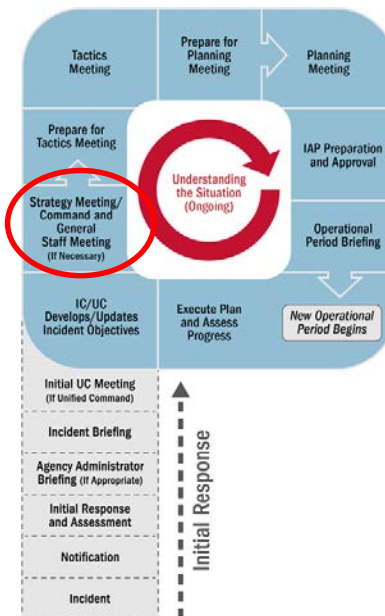
AHIMTs must have the flexibility to schedule this meeting to meet the demands of the incident and other external influences that may affect the timing of the meeting. The C&GS Meeting is not a required step during the All-Hazards Planning Cycle and the development of an Incident Action Plan, but is a special-purpose meeting, as it is described.

The NIMS Planning Cycle uses the term C&GS Meeting for a meeting that occurs each operational period, a meeting where the Command and General Staff are brought together for discussion and to address many of the same items found on the All-Hazards Planning Cycle during the Initial Strategy Meeting and subsequent Strategy Meeting(s). In practice, those are conducted on an as-needed basis, as they should be.

All-Hazards Planning P



NIMS Planning P



An example of the issues developers face when trying to apply what tribal, state, and local responders do within the All-Hazards environment, but trying to use the NIMS Planning Cycle to describe what they do, is shown in the FEMA EMI E/L 0962 NIMS ICS All-Hazards Planning Section Chief Course Instructor Guide v1.0, dated June 2019. This correctly describes the Command and General Staff Meeting as a meeting *outside* the planning cycle, yet the NIMS graphic shows it as part of the planning cycle.

The Instructor Guide Notes for Visual 6.55 list the Command and General Staff meeting as a meeting *outside* the planning cycle.

“These meetings are not mandatory and do not have a set time or location. They are set up as needed. The Planning Section Chief may be responsible for attending and facilitating a number of these meetings. The following visuals explain the purpose of each meeting.

“Other meetings and briefings include:

- *Command and General Staff Meetings*
- *Transition Meetings*
- *Debriefing/Close-out Meetings*
- *Public Meetings*
- *Agency-specific Reviews*
- *Planning Section Meetings”*

The visual on the following page (Visual 6.56) correctly describes the Command and General Staff Meeting:

"COMMAND AND GENERAL STAFF MEETINGS

"Explain: The Command and General Staff Meetings are used to discuss important information that affects the team. They are usually called by the Incident Commander, but may be on a regular schedule (i.e., daily or every other day). They are typically scheduled during a slow period. The level of involvement is determined by the Incident Commander. Command and General Staff Meetings can be held over lunch. You need frank discussions on problems to be successful."

However, the NIMS Planning Cycle combines these two vastly different meetings and additionally requires the meeting to be conducted in a specific sequence during the planning cycle. This is an incorrect application of the Command and General Staff Meeting in the All-Hazards Community and is not currently practiced by the teams.

Resolution

The All-Hazards Incident Management Teams Association (AHIMTA) represents hundreds of Federal, tribal, state, and local responders and several stakeholder organizations. We strongly believe that the currently planned removal of the All-Hazards Planning Cycle will negatively affect our members and thousands of first responders throughout the nation. We have tried numerous times to correct the issues identified but have had little success. The curriculum rewrite tremendously exacerbates the issue.

The AHIMTA strenuously objects to the replacement of the All-Hazards Planning Cycle graphic and its explanations from the EMI Incident Command System position-specific curriculum during the revision process. Discontinuing its use is unnecessary, confusing, and ill-advised. It does not serve the needs of our tribal, state, and local responder membership and will complicate the training process, since this membership and all incident management team trainees will need to be retrained once they join Incident Management Teams. Having training personnel use a method that does not factually represent the process they will use when managing incidents and events is not an efficient use of training resources or stakeholders' time.

The ideal resolution for correcting the discrepancies between the current NIMS Planning Cycle and the All-Hazards Planning Cycle would be for the NIC to exchange the All-Hazards Planning Cycle with the NIMS Planning Cycle during the next refresh of the NIMS, immediately advise the EMI they will be doing so, and ensure the EMI understands they have permission from and direction by the NIC/NCG to continue using the May 2006 AHPC as it existed in the courses prior to the partial rewrite in 2019–2020. It should be noted that Federal agencies such as the USCG, FEMA-IMAT, and EPA currently use their own variations of the planning cycle supported by their agency-specific courses, ICS forms, and procedures, so there should be no appreciable consternation over the change, especially considering the statement in the 2017 edition of NIMS, on page 106.

A second alternative is that, although the NIMS keeps the current planning cycle graphic, the EMI should be given express permission and direction by the NIC/NCG to continue using the May 2006 AHPC as it existed in the courses prior to the partial rewrite in 2019–2020. As previously indicated, NIMS allows for other versions of the planning cycle graphic to be used as training and operational aids. The USFA received permission to continue using the AHPC in the O-305 course and the skills sustainment exercise they have developed by following the NIC-provided guidelines.

The EMI All-Hazards Position-Specific Courses are used not only by the All-Hazards community, but also by several stakeholder organizations in place of their own. As an example, the NWCG adopted the use of several of the EMI courses in place of their Command and General Staff courses. The AHPC follows the operational practices the federally managed IMTs currently follow – which is completely complementary to NWCG’s training efforts. The proposed changes carry the potential risk of not properly representing current IMTs’ operational practices and procedures. This will place the NWCG and other stakeholders in a dilemma: Do they continue to support and use a curriculum that does not properly reflect their practices, or do they withdraw their support and develop their own curriculum?

The AHPC graphic has been used to train more than 40,000 state, NWCG, tribal, and local responders during the past 12 years. These responders will be adversely affected by the proposed rewrite and removal of the AHPC graphic they use when managing incident and events.

The FEMA EMI All-Hazards Position-Specific Training Courses must reflect the practices of the stakeholders who are the intended audience for these materials: the tribal, state, and local responders.