U.S. Department of Transportation
United States Coast Guard

Commandant
United States Coast Guard

2100 Second Street, SW
Washington, DC 20593-0001
Staff Symbol: G-OPF-3
Phone: (202) 267-1532

COMDTINST 3120.14
SEP 28 1998

COMMANDANT INSTRUCTION 3120.14

Subj: INCIDENT COMMAND SYSTEM
(a) Ref: National Contingency Plan, 40 CFR 9 and 300
(b) Marine Safety Manual Vol. IX, COMDTINST M16000.14
(c) Contingency Preparedness Planning Manual, Vol. I, Planning

Doctrine and Policy, COMDTINST M3010.11A

1. PURPOSE. To adopt a standardized response management system for Coast Guard contingency response actions. The information contained in this instruction will be incorporated into the next changes to references (b) and (c).

2. ACTION. Area and district commanders, commanders of maintenance and logistics commands, unit commanding officers, assistant commandants for directorates, Chief Counsel, and special staff offices at Headquarters shall comply with the requirements of this instruction and ensure that all personnel involved in response actions are familiar with, and trained in, the use of the National Interagency Incident Management System (NIIMS) based Incident Command System (ICS). Further, Area Contingency Plans (ACPs) and contingency plans prepared in accordance with references (a) and (c) shall use an ICS structure in their response organization and management procedures that is consistent with the guidance in this instruction.

3. DIRECTIVES AFFECTED. COMDTINST 16471.1 is canceled.

4. BACKGROUND..

a. Commandant Instruction 16471.1 mandated NIIMS ICS be used for all Coast Guard hazardous material and oil spill response actions. It encouraged that ICS be used for other contingencies as well. Since its publication, the Coast Guard has enjoyed considerable success in oil and hazardous material responses that can be attributed to the use of ICS. Its use has been particularly effective in providing common response organization and process

that non-Coast Guard personnel can assimilate. Recent exercises and events have successfully tested ICS for other Coast Guard contingencies where ICS is particularly relevant, developing the Coast Guard Incident Commander (CGIC) response organization, reference (c). Tests of Commander Coast Guard Forces (CCGF) and the traditional Search and Rescue (SAR) organization and procedures have shown ease of ICS use and benefits to its employment. Based on these and similar reasons, the Joint Operations and Marine Safety Coordination Council (JOMSCC) decided to adopt NIIMS ICS as the response management system for all Coast Guard response operations. This instruction reflects that decision.

b. Reference (c) identifies ten separate contingencies that Coast Guard contingency plans should address. It also describes both Commander Coast Guard Forces (CCGF) and Coast Guard Incident Commander (CGIC) as acceptable contingency response organizations, but does not mandate the use of one or the other for the various contingencies. While both of these organizations promote unity of command and unity of effort for Coast Guard forces involved in any contingency response operation, they encompass different extents of operational control over subordinate units and different organizational structures and processes.

c. The failure to adopt a standard response system within the Coast Guard can create inefficiencies for all parties involved in response operations. These inefficiencies include:

(1) Use of a response system not normally in the public domain, which precludes its use to all members of the response community and increases training costs.

(2) The lack of a standard system forces units to locate and provide training from any available source. This potentially duplicates effort and does not foster doctrine that instills ICS within each command.

(3) The lack of a standard response management system prevents the development of a highly effective training curriculum. A structured training curriculum would result in qualified personnel who can immediately support units engaged in contingency response nationally, regionally, and locally, unimpacted by transfers among different Coast Guard units.

5. <u>DISCUSSION</u>.

a. NIIMS ICS was originally designed by a group of local, state, and federal agencies with fire protection responsibilities to improve the ability of fire forces to respond to any type of emergency. A new training curriculum was completed in 1994 to better reflect the all hazard-all risk capability of NIIMS (applicable to all emergencies, i.e., floods, earthquakes, spills, fires). It is organizationally flexible, and capable of expanding and contracting to accommodate responses of varying size or complexity.

b. The Coast Guard ICS organization structure will, whenever possible and practical in the oil or hazardous substance spill contingency, incorporate a Unified Command structure in place of the individual Incident Commander in accordance with reference (a). The Unified Command includes the predesignated Federal On-Scene Coordinator (FOSC), the predesignated State Incident Commander representing state and local response agencies, and the Responsible Party. The Unified Command is responsible for the overall management of the incident with the FOSC retaining ultimate authority. Some incidents will call for other organizations to be represented in the UC. For example, the local fire department when an incident includes both pollution and fire, or other law enforcement organizations in a pollution incident associated with sabotage. The use of Unified Command is encouraged where appropriate in other contingency response situations.

c. NIIMS consists of five major subsystems that collectively provide a total systems approach to all risk incident management. These five subsystems are:

(1) Incident Command System - The on-scene management structure is called the Incident Command System. Operating requirements and interactive management components for organizing and operating the system are included.

(2) Training - The training subsystem provides complete course materials to provide training in both ICS processes and function, plus specific skills training.

(3) Qualifications and Certification - A qualification and certification subsystem is provided for those personnel who are expected to be assigned regionally or nationally. It also allows for development of minimum standards to meet local needs. Position Task Books have been created that contain all critical tasks which are required to perform a system critical job assignment.

(4) Publication Management - The National Wildfire Coordination Group (NWCG) maintains a subsystem that includes development, publication, stockpiling, and distribution of NIIMS materials to government agencies.

(5) Supporting Technology - A subsystem that is still primarily directed toward support of fire suppression missions.

d. The adoption of NIIMS provides the following advantages:

(1) A flexible standard response management system that will allow for the cultivation of response management expertise at all echelons of Coast Guard command. This increases the pool of support available to commanding officers during major incidents.

(2) NIIMS is a "public domain" system that allows unrestricted distribution by commanding officers to improve the capabilities of and unify the local response community into a more effective organization.

(3) Use of the training subsystems will allow development of a comprehensive training plan which will ensure that all personnel receive appropriate training for their assigned duties.

(4) Use of the publication subsystem will allow for the economical acquisition of needed materials without requiring substantial effort on the part of personnel or the need to stock large quantities of material.

e. The purpose of the Coast Guard adoption of NIIMS ICS is to ensure that common standards are used in both organization and procedure which: (1) Apply to any contingency response situation.

f. Provide for logical and smooth organizational expansion and contraction.

g. Maintain autonomy for each agency participating in the response.

h. Allow the Commanding Officer to concentrate on the task at hand rather than be distracted by having to develop an organization or attempting to fit resources from outside the unit into the organization.

i. ICS provides a basic organizational structure along with recommended responsibilities for staff within the organization. The scope and complexity of the emergency and specific requirements of the incident commander will determine the extent of the organizational positions actually staffed. In many cases, a single person will fill multiple positions within an ICS organization.

j. Due to the similarity between NIIMS and other response management systems, Coast Guard responders familiar with NIIMS may readily integrate into other systems when another agency has the lead and offers a comparable response management system.

k. A Field Operations Guide (FOG) was developed by representatives from the Coast Guard, State of California, and the oil industry to coordinate ICS/UC operations during environmental emergencies. The FOG is intended to be a tool to supplement training rather than a stand alone document. By reading the general instructions, the unit leader responsibilities, the position descriptions and

checklists, a responder will be guided in their duties within the ICS. FOGs for other contingencies will be developed as a part of the Coast Guard's implementation of ICS.

6. PROCEDURE.

(1) The USCG Response Management Coordination Council has been chartered by the Joint Operations and Marine Safety Coordinating Council. This Council shall develop a comprehensive program using the training and qualifications subsystem of NIIMS to assist Coast Guard units in implementing NIIMS ICS.

(2) Area and District Commanders, Group and Activities Commanders, and Air Station and Marine Safety Office Commanding Officers shall adopt NIIMS ICS as the standard response organization for all contingencies for which they plan. Other Coast Guard unit Commanders, Commanding Officers and Officers in Charge shall familiarize their units with NIIMS ICS principles to facilitate integration into any contingency response operation.

(3) In the oil and hazardous substance spill contingency, Coast Guard personnel should integrate into the responsible party's system when the RP has taken the lead for the emergency and is using a response management system providing efficient and effective removal actions.

(4) District commanders shall maintain a comprehensive list of personnel qualified for all positions within the ICS organization at the level of unit leader, division/group supervisor or higher.

(5) District commanders shall maintain a cache of ICS forms and equipment to support operations in response to a worst case scenario for the first 10 days.

(6) Commanding officers of MSOs, and captains of the port, shall revise Annex B of all Area Contingency Plans under their cognizance to reflect this standard. All other commanders and commanding officers who prepare contingency plans shall revise Annex J and other pertinent annexes to reflect this standard.

(7) Commanding officers shall maintain a supply of ICS forms and equipment to support operations in response to a worst case scenario for the first 48 hours.

(8) Commandant Instruction 16471.2, Incident Command System Implementation Plan, will be updated to reflect the ICS implementation details.