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Letter to the Editor Regarding Incident Command System (ICS)

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Abstract

Comments regarding the article “A Critical Evaluation of the Incident Command System and NIMS” in *Journal of Homeland Security and Emergency Management*: Vol. 3: No. 3, Article 1. Available at: <http://www.bepress.com/cgi/siteview.cgi/jhsem/vol3/iss3/1>.

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This is a letter to the editor regarding “A Critical Evaluation of the Incident Command System and NIMS” in *Journal of Homeland Security and Emergency Management*: Vol. 3: No. 3, Article 1. The following general observations, not in priority order, are the opinion of this writer and do not represent an official opinion of the Seattle Fire Department or the City of Seattle.

- Focus must be maintained on ICS as an Event and Incident management tool versus a long-term recovery system. The differences are such that ICS’s strengths are on the former, but some of the basic inter-agency coordination tenets may be beneficial to the latter as well.
- Most (if not all) alleged failures of ICS at incidents can be attributed to one of the following:
 - Poor understanding of the ICS process
 - Lack of intra and inter-agency training on the ICS process
 - Little or no buy-in in the ICS process
 - Practitioner error in proper implementation of good ICS processes
 - Poor implementation of ICS resulting in naysayer reinforcement
- Practitioner error and/or poor implementation in the ICS process do not mean that ICS is flawed. It is a tried-and-true system proven over almost 40 years of use. However, this may not translate into a system for the Recovery phase of an incident.
- Unorganized volunteers are cited as an example of an informal group that ICS is not well suited to deal with in a disaster. To the contrary, properly implemented ICS with an experienced Command and General Staff will “flex” the organizational structure to corral and manage volunteers. The Liaison Officer, Logistics Section Chief, and Planning Section Chief can yield positive results via close coordination with the formal ICS structure and convergent volunteers.
- All disasters are local in nature, which is the level at which ICS has been best demonstrated as a good management process. The assertion that ICS lacks focus on the coordination between organizations and levels of government is false. The breakdown is more likely the lack of ICS competency by these organizations and governmental agencies. NIMS is endeavoring to correct this

by: 1) being the national standard applied to all levels of government; and 2) expanding the definition of “first responder” (*see HSPD-8*) to apply to a much broader group.

- The article contained good observations regarding agencies (e.g., law enforcement) which resolve many calls single-handedly and thus don't have occasion to use ICS, and are then not familiar enough with it to successfully implement it in a complex disaster.
- I disagree with the assertion that the fire service has more scientifically “defined” our hazards and reduced uncertainty, thereby causing ICS to work better, and that ICS does not work as well in uncertain situations such as natural disasters. (ICS principles are applicable to incident management and mitigation. The risk-benefit-analysis and ongoing size-up influence incident objectives, which determine the size/scope of the ICS structure, whether a “familiar” type of threat, i.e. house fire, or a unique disaster, i.e. the Murrah Building in Oklahoma City.)
- Several groups and studies are cited throughout the document. In some cases, it becomes a “so what.” In question are two factors: 1) the knowledge level (true understanding of field implementation) of the questioners conducting the study so that they can accurately determine the validity of the respondents' feedback; and 2) the respondents' knowledge and proper implementation of ICS. If the researchers don't recognize that the respondents' negative perspectives of ICS may be due to their poor understanding of it and instead believe them to be credible interviewees based simply on their job title, then the findings of their study are in question. Put another way, “garbage in, garbage out.”
- The Pentagon response is cited as a “textbook” example of highly effective ICS implementation. This is because the affected agencies had trained, practiced, and exercised ICS since the 1982 Air Florida crash into the Potomac River.
- HSPD 5 and 8 are attempting to force the country to develop this same level of pre-disaster skill level via training and exercises.
- The WTC example is too politically generous. ICS did not work there because it was not implemented properly (if at all) by local responders. They are still struggling to genuinely practice ICS effectively.

- The following are some very true observations: 1) “By working problems together (using ICS) participants gain an understanding of and trust in one another.” 2) “Over a period of time, divergent opinions and perspectives converge into what is a workable plan.” and 3) “...while the training discussed leads to technical proficiency, it is less often realized but equally important that training creates a sense of familiarity among participants.”
- This is a key statement: “Repeatedly, the respondents in our study cited prior familiarity with the people and the response organizations as the most important factor and suggested that ICS provided a convenient template around which to organize and plan for response.”
- NIMS / ICS is better suited to event/incident management/mitigation than to the recovery process and its associated bureaucratic and political issues.