



## CITY OF PORTLAND, OREGON



### Bureau of Police

Ted Wheeler, Mayor

Charles Lovell, Chief of Police

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### Executive Summary

## Directive 700.00, Bureau Response to All-Hazards Using the National Incident Management System (NIMS) (formerly, National Incident Management System and Incident Command System)

### Introduction

The Portland Police Bureau initiated its review of Directive 700.00, Bureau Response to All-Hazards Using the National Incident Management System (NIMS) (formerly, National Incident Management System and Incident Command System), in March 2020. The Bureau completed a comprehensive revision of the directive to streamline its emergency management and incident planning procedures, and to ensure adherence to state requirements and Federal Emergency Management Agency (FEMA) standards.

### Public Comments

The Bureau received several comments over the course of both universal review and public comment periods for the directive. The feedback ranged from recommendations pertaining to the organizational structure of the policy to thoughtful concerns about the use of national standards for certain types of incidents. The responses also included questions about the intended objective of the directive.

### *Policy Purpose*

During the first universal review and public comment period, the Bureau received feedback from an individual who commented on the comprehensiveness of the NIMS system and recommended that the Bureau consider adopting directive changes that more acutely address the application of the system.

Given the intricacies of NIMS and the ever-evolving nature of emergency management, the Bureau framed the revised policy as a general source of guidance for emergency and incident management, detailing the roles of key stakeholders in this context, particularly, the Bureau's Emergency Management Unit (EMU). The revised policy formalizes the Bureau's management of emergency events and other incidents, defines critical terms, and describes the Bureau's protocols for responding to various incidents. Current NIMS standards and guidelines are available on FEMA's Emergency Management Institute webpage.

### *Streamlining the Policy*

The Bureau received several comments in which internal and external stakeholders requested that the Bureau simplify the directive. The previous version of the policy was overly complex and lacked clarity with regard to the responsibilities of various Bureau members and units, as

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well as the meanings of key terms in this sphere. Recognizing the need to outline succinctly and clearly the Bureau's practices and procedures pertaining to emergency management, the Bureau heeded the recommendations of community and Bureau members and revised the policy to appropriately address identified gaps and simplify its guidelines.

#### *Use of the NIMS Model for Managing Demonstrations and Events*

The Bureau received a comment about the its application of the NIMS model to demonstrations and events. More specifically, the individual expressed concern about the Bureau's use of FEMA-prescribed techniques to respond to and manage events in which groups or individuals exercise their First Amendment rights.

The Bureau acknowledges the inherent differences between an emergency incident and a gathering for the expression of constitutional rights. However, the NIMS model establishes a reliable structural framework for *organizing* a Bureau response to and *overseeing* any type of event. Use of the model does not pre-determine the tactics or crowd management strategies employed during a demonstration. Demonstrations can be dynamic in nature, so having a consistent management structure in place facilitates the Bureau's response. The Bureau remains committed to aligning its practices in this regard with best practice standards, while also emphasizing in its management of a demonstration or event, not unduly hindering the exercise of First Amendment rights.

#### *Incident Action Plan Template*

A commenter recommended the use of an Incident Action Plan (IAP) template to increase efficiency and allow for more time and attention spent on the management of an incident. The Bureau recognizes the potential benefit that adapting a pre-written framework could yield; however, IAP development guidelines recommend creating incident-specific plans, given the complexities and unique variables of each incident. Written plans used for previous incidents are available for members' reference. A member may refer to an archived plan to inform the development of a new written plan or to reuse content for comparable incidents.

We thank every individual who took the time to provide feedback on this directive. All comments received during both review periods are located at the end of this document. We have removed all personal information to protect the privacy of commenters.

#### The Bureau's Revised Policy

The Bureau made significant revisions to the directive both to account for enhancements to the NIMS model, and to clarify essential terms and stakeholder responsibilities. Furthermore, the updated policy underscores the role of the Bureau's EMU as the central source for the Bureau's emergency management planning and training. The previous iteration of the policy was dense and lacked clear explanation of key functions and emergency management phrases. The streamlined directive provides clearer guidance, which yields accurate implementation of the NIMS model and lends itself to a more soundly organized Bureau response to various incidents.

The Bureau welcomes further feedback on this policy during its next review.

This directive goes into effect on 10/02/20. Published on 09/02/20.

## **700.00, Bureau Response to All-Hazards Using the National Incident Management System (NIMS)**

### **Refer:**

- Federal Emergency Management Agency (FEMA) National Incident Management System (NIMS) 3<sup>rd</sup> Edition, October 2017

### **Definitions:**

- Continuity of Operations (COOP) Plan: A document that establishes essential functions, orders of succession, delegation of authority, continuity of facilities and communications, vital records management, and other critical tasks to be performed during a wide range of emergencies. The COOP plan also addresses how the organization will return to normal operations.
- Emergency Operations Center (EOC)/Emergency Coordination Center (ECC): A physical location where the coordination of information and resources to support incident management (on-scene operations) activities normally takes place.
- Emergency Operations Plan (EOP): A pre-determined approach for responding to a variety of potential hazards.
- Incident Command Post: The field location where the primary functions of incident command are performed.
- Incident Command System (ICS): A standardized approach to the command, control, and coordination of on-scene incident management.

### **Policy:**

1. The Portland Police Bureau (PPB) has adopted the National Incident Management System (NIMS), as developed by the Federal Emergency Management Agency (FEMA), to ensure effective and efficient emergency response management for various threats and hazards, as well as planned and unplanned events. NIMS provides the framework for how the PPB works with all levels of government, non-governmental and private sector organizations, across jurisdictions to prevent, protect against, mitigate, respond to, and recover from an incident.
2. PPB will utilize the Incident Command System (ICS), including incident action planning for both planned and unplanned events. Consistent with the ICS, the Bureau will scale its incident management based on the size of the event, from a routine police response to a larger or more complex incident, such as a protest or natural emergency/disaster. An Incident Action Plan (IAP) provides a concise and consistent means of capturing and communicating overall incident priorities, objectives, strategies, and tactics for both operational and support activities. Incidents must have an action plan. However, not all incidents require a written plan. Most initial response operations are not captured with a formal IAP; however, if an incident is likely to extend beyond one operational period, become more complex, or involve multiple jurisdictions and or agencies, preparing a written

IAP will become increasingly important to maintain effective, efficient, and safe operations. Using ICS for all incidents or planned events helps members improve and maintain the skills needed for the large-scale incidents.

3. PPB members shall be required to know the principles of ICS and complete the necessary training commensurate with their rank and position.

**Procedure:**

1. Emergency Management Unit (EMU) Responsibilities.
  - 1.1. Act as the Bureau's single point of contact for matters relating to emergency management planning and exercises, as well as NIMS compliance.
  - 1.2. Ensure NIMS concepts, principles, terminology, and processes are adopted when an incident command post (ICP) is activated at the direction of the Chief's Office.
  - 1.3. Provide input on the City of Portland's Emergency Operations Plans (EOP) upon request.
  - 1.4. On a quarterly basis, request guidance from the Chief's Office for information to include in the Bureau's Continuity of Operations (COOP) plans and any other EOPs.
  - 1.5. Maintain the COOP plan and compliance with NIMS requirements.
  - 1.6. Develop and coordinate the Bureau's emergency response training and exercises through seminars, workshops, tabletop exercises, or other feasible means in accordance with EMU's training and exercise plan.
  - 1.7. Identify and inventory all deployable resource assets throughout the Bureau using NIMS resource typing for qualified assets.
  - 1.8. Advise Bureau executive leadership and supervisors on incidents involving emergency response and provide guidance regarding the organization and management of an ICP and Emergency Operations Center (EOC)/Emergency Coordination Center (ECC).
  - 1.9. Identify required FEMA training courses for members, commensurate with rank and position, and submit to the Chief's office for approval and distribution in a special order.
2. Chief's Office Responsibilities.
  - 2.1. Designate the EMU as the single point of contact of all matters related to emergency management planning and exercises.
  - 2.2. Ensure PPB complies with Oregon's Emergency Management NIMS compliance program.
  - 2.3. Ensure the Bureau teaches and utilizes NIMS for all hazards and applies ICS as the standard approach to on-scene command, control, and coordination of incidents.

- 2.4. Develop intrastate and interagency mutual aid agreements and/or assistance agreements and ensure communications are up-to-date with the State, partnering City agencies, neighboring jurisdictions, and appropriate external organizations.
3. Business Services Group Responsibilities.
  - 3.1. Maintain existing mutual aid agreements and assistance agreements the Bureau has established with the State and other agencies.
4. Training Division Responsibilities.
  - 4.1. The Learning Management System (LMS) Manager shall ensure the required FEMA courses are assigned in LMS for members who need to complete them.
5. Member Responsibilities.
  - 5.1. Newly hired members (officers) or members (officers) who are in probationary status shall complete FEMA's Independent Study (IS) 100 and IS 700 courses within one year of hire, as required by the Department of Public Safety Standards and Training, in order to receive their basic certification to be a sworn officer.
  - 5.2. Within one year of a promotion to any rank, members shall complete additional courses as required by Oregon's Emergency Management program or directed by the Chief.
6. Supervisor Responsibilities.
  - 6.1. Supervisors shall apply ICS as the standard approach to on-scene command, control and coordination of incidents, including incident action planning.

## **Directive 700.00, National Incident Management System (NIMS) and Incident Command System (ICS)—**

### **About Bureau Response to All-Hazards Using the National Incident Management System (NIMS) and**

#### **Refer:**

- Federal Emergency Management Agency (FEMA) National Incident Management System (NIMS) 3<sup>rd</sup> Edition, October 2017

#### **Definitions:**

- Continuity of Operations (COOP) Plan: A document that establishes essential functions, orders of succession, delegation of authority, continuity of facilities and communications, vital records management, and other critical tasks to be performed during a wide range of emergencies. The COOP plan also addresses how the organization will return to normal operations.
- Emergency Operations Center (EOC)/Emergency Coordination Center (ECC): A physical location where the coordination of information and resources to support incident management (on-scene operations) activities normally takes place.
- Emergency Operations Plan (EOP): A pre-determined approach for responding to a variety of potential hazards.
- Incident Command Post: The field location where the primary functions of incident command are performed.

#### **Incident Command System (ICS):**

- ~~1. Through Presidential Directive (Homeland Security Presidential Directive 5 (HSPD-5)), the Secretary of Homeland Security was directed to develop and enhance the ability of the United States to manage domestic incidents by establishing a nationwide, systematic and comprehensive approach to incident management via National Incident Management System (NIMS). By adopting NIMS and its accompanying structures, emergency management personnel from various disciplines are able to work together to prepare for, prevent, respond to, recover from, and mitigate the effects of incidents. Components of NIMS include:
 
  - ~~1.1. *Preparedness*—Effective emergency management and incident response activities begin with a host of preparedness activities conducted on an ongoing basis in advance of any potential incident. Preparedness involves an integrated combination of assessment; planning, procedures and protocols, training and exercises, personnel qualifications, licensure and certification, equipment certification, and evaluation and revision.~~
  - ~~1.2. *Communications and Information Management*—Emergency management and incident response activities rely on communications and information systems that provide a common operating picture to all command and coordination sites. NIMS describe the requirements necessary for a A standardized framework for communication and emphasized the need for a common operating picture. This component is based on the~~~~

concepts of interoperability, reliability, scalability, and portability, as well as the resiliency and redundancy of communications and information

~~1.3. *Resource Management*—Resources (such as personnel, equipment, or supplies) are needed to support critical incident objectives. The flow of resources must be fluid and adaptable to the requirement of the incident. NIMS defines standardized mechanisms, and establishes the resource management process to identify requirements, order and acquire, mobilize, track and report, recover and demobilize, reimburse, and inventory resources.~~

~~1.4. *Command and Management*—The Command and Management component of NIMS is designed to enable effective and efficient incident management approach to the command, control, and coordination by providing a flexible, standardized incident management structure. The structure is based on three (3) key organizational constructs: The Incident Command System (ICS), Multiagency Coordination Systems, and Public Information.~~

~~1.4.1. The NIMS specifically requires the ICS be institutionalized as a best practice standard for emergency management across the country. The ICS is a standardized method for managing emergencies that enables a coordinated response among various jurisdictions and agencies; establishes common processes for planning and managing resources, allows for the integration of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure. The ICS can be used for planned events, natural disasters, and acts of terrorism.~~

- ~~*Ongoing Management and Maintenance*—Within the auspices of Ongoing Management and Maintenance, there are two (2) components: the National Integration Center (NIC) and Supporting Technologies of on-scene incident management.~~

### Policy:

1. The Portland Police Bureau (PPB) has adopted the National Incident Management System (NIMS), as developed by the Federal Emergency Management Agency (FEMA), to ensure effective and efficient emergency response management, thus in turn adopts the principles of for various threats and hazards, as well as planned and unplanned events. NIMS provides the framework for how the PPB works with all levels of government, non-governmental and private sector organizations, across jurisdictions to prevent, protect against, mitigate, respond to, and recover from an incident.
1. PPB will utilize the Incident Command System (ICS), which include command management and including incident action planning:
  - 1.1. *Command Management*: Effective incident management relies on a firm command and control structure for managing resources, making decisions, and assigning tasks. Although information is exchanged freely through the ICS structure, strict adherence must be paid to this top-down management approach when managing incidents in the field.
2. *Incident Action Planning*: Centralized, coordinated incident action planning should guide all response activities, for both planned and unplanned events. Consistent with the ICS, the Bureau will scale its incident management based on the size of the event, from a routine

police response to a larger or more complex incident, such as a protest or natural emergency/disaster. An Incident Action Plan (IAP) provides a concise and consistent means of capturing and communicating overall incident priorities, objectives, ~~and strategies,~~ and tactics for both operational and support activities. Incidents must have an action plan. However, not all incidents require a written plan. Most initial response operations are not captured with a formal IAP. ~~However;~~ however, if an incident is likely to extend beyond one operational period, become more complex, or involve multiple jurisdictions and/or agencies, preparing a written IAP will become increasingly important to maintain effective, efficient, and safe operations. Using ICS for all incidents or planned events helps members improve and maintain the skills needed for the large-scale incidents.

- ~~3. The Portland Police Bureau will utilize the Incident Command System (ICS) for both planned and unplanned events. ICS can be scaled for event size; routine police response to emergencies, up to natural disasters, civil disorder, or any large-scale incident. Using ICS for all incidents or planned events helps improve and maintain skills needed for the large-scale incidents.~~
- ~~4. The Police Bureau will ensure its members are trained utilizing ICS coursework appropriate to their rank and grade.~~
3. PPB members shall be required to know the principles of ICS and complete the necessary training commensurate with their rank and position.

#### **Procedure:**

1. ~~Incident Command System (ICS): Emergency Management Functions Unit (EMU) Responsibilities.~~
  - ~~1.1. Command: Sets the incident objectives, strategies, and priorities and has overall responsibility for the incident.~~
  - ~~1.2. Operations: Carries out the operations to reach the incident objectives, establishes tactics and directs all operational resources.~~
  - ~~1.3. Planning: Supports the incident action planning process by preparing incident action plans, tracking resources, collecting/analyzing information, and maintaining documentation.~~
  - ~~1.4. Logistics: Arranges for resources and needed services to support achievement of the incident objectives.~~
  - ~~1.5. Finance/Administration: Monitors costs related to the incident. Provides accounting, procurement, time recording, and cost analysis.~~
- ~~2. Incident Command System (ICS): Command Staff~~
  - ~~2.1. Incident Commander: Possesses overall responsibility for managing the incident by establishing objectives, planning strategies, and implementing tactics. The Incident Commander is the only position that is always staffed in ICS applications. On small incidents and events, the one person Incident Commander may accomplish all five (5) management functions. Incident Commander responsibilities include:~~
    - ~~2.1.1. Require clear authority and knowledge of agency policy,~~

- ~~2.1.2. — Ensure incident safety,~~
- ~~2.1.3. — Establish the Incident Command Post,~~
  - ~~2.1.3.1. — Set priorities through incident objectives and implementation strategies~~
- 1.1. Create the Incident Command System Act as the Bureau's single point of contact for matters relating to emergency management planning and exercises, as well as NIMS compliance.
- 1.2. Ensure NIMS concepts, principles, terminology, and processes are adopted when an incident command post (ICP) is activated at the direction of the Chief's Office.
- 1.3. Provide input on the City of Portland's Emergency Operations Plans (EOP) upon request.
- 1.4. On a quarterly basis, request guidance from the Chief's Office for information to include in the Bureau's Continuity of Operations (COOP) plans and any other EOPs.
- 1.5. Maintain the COOP plan and compliance with NIMS requirements.
- 1.6. Develop and coordinate the Bureau's emergency response training and exercises through seminars, workshops, tabletop exercises, or other feasible means in accordance with EMU's training and exercise plan.
- 1.7. Identify and inventory all deployable resource assets throughout the Bureau using NIMS resource typing for qualified assets.
  - ~~2.1.3.2. — 1.8. Advise Bureau executive leadership and supervisors on incidents involving emergency response and provide guidance regarding the organization specific to the incident in need of and management;~~
  - ~~2.1.3.3. — Approve the Incident Action Plan,~~
  - ~~2.1.3.4. — Coordinate Command and General Staff activities,~~
  - ~~2.1.3.5. — Approve resource requests of an ICP and use of volunteers and auxiliary personnel;~~
  - ~~Order demobilization as needed,~~
  - ~~2.1.3.6. — Ensure after-action reports are completed.~~
- ~~2.1.4. — Authorize information release to the press/media.~~
- ~~2.2. Safety Officer: Monitors incident operations and advises the Incident Commander on all matters relating to operational safety, including the health and safety of emergency responder personnel.~~
- ~~2.3. Public Information Officer (PIO): Responsible for interfacing with the public and media and/or with other agencies according to incident-related information requirements. The PIO develops accurate and complete information on the incident's cause, size, and current situation; resources committed; and other matters of general interest for both internal and external consumption.~~

~~2.4. The Liaison Officer: Serves as the point of contact for representatives of other governmental agencies, nongovernmental organizations, and/or private entities. Representatives from assisting or cooperating agencies and organization coordinate through this position.~~

### ~~3. Incident Command System (ICS): General Staff~~

~~3.1. Operations Section Chief: Develops and implements strategy and tactics to carry out the incident objectives. The Operations Section Chief organizes, assigns and supervises the tactical response resources. To maintain span of control, the Operations Section Chief may establish branches, groups and/or divisions.~~

~~3.2. Planning Section Chief: Oversees the key activities of collecting, evaluating, and displaying incident intelligence and information. The Planning Section Chief also prepares documents for Incident Action Plans, tracks resources assigned to the incident, and maintains incident documentation. It is up to the Planning Section Chief to activate any needed additional staffing.~~

#### ~~3.2.1. Planning Section Support Units:~~

~~3.2.1.1. — Resource Unit Establishes check-in function at incident location and works to achieve total accountability and tracking of all incident resources (personnel and equipment). Track resource status as Assigned, Available or Out of Service.~~

~~3.2.1.2. — Situation Unit Prepares and maintains the situation displays such as maps, forms, weather reports, victim or damage assessments and other reports from technical specialists.~~

~~3.2.1.3. — Documentation Unit Collects and organizes incident information, forms, Incident Action Plans, information releases and reports. Establish a duplication service, files copies of all official forms and reports, provide incident information to appropriate requesters, and provide status reports to appropriate requesters.~~

~~3.2.1.4. — Demobilization Unit Evaluates logistics and transportation capabilities required to support demobilization. Prepares and obtains approval of Demobilization Plan including required decontamination, monitors and assists in coordinating the demobilization plan.~~

~~3.3. Logistics Section Chief: Assures there are adequate resources for meeting the incident objectives. The Logistics Section Chief maintains span of control by adding Branch Directors and Unit Leaders. Additionally, the Logistics Section Chief oversees the chief activities of ordering, obtaining, maintaining, and accounting for essential personnel, equipment and supplies. This position also provides communication planning and resources, supplies food services for responders, sets up and maintains incident facilities and provides medical services and support transportation to incident personnel.~~

#### ~~3.3.1. Logistic Section Support Units:~~

~~3.3.1.1. — Supply Unit Obtains additional personnel, supplies and equipment to support the mission.~~

~~3.3.1.2. — Food Unit Obtains necessary equipment and supplies to operate food service to the mission.~~

- ~~3.3.1.3.— Ground Support Unit— Provides all ground transportation during an incident. In conjunction with providing transportation, the Ground Support Unit is also responsible for maintaining and supplying vehicles, keeping usage records, and developing incident traffic plans.~~
- ~~3.3.1.4.— Communications Unit— Establishes appropriate communications for the incident. Prepares and implements radio communications plan.~~
- ~~3.3.1.5.— Facilities Unit— Obtains and activates incident facilities. Prepares layouts of incident facilities and obtains personnel to operate facilities. Provides facility maintenance services such as sanitation, lighting, and cleanup.~~
- ~~3.3.1.6.— Medical Unit— Responsible for the effective and efficient provision of medical services to incident personnel.~~
- ~~3.4. Finance/Administration Section Chief: This role is filled for any incident that requires incident-specific financial management. The Finance/Administration Section Chief is responsible for contract negotiation and monitoring, time keeping, cost analysis, compensation for injury or damage to property, and documentation for reimbursement (e.g. under mutual aid agreements and assistance agreements).~~
- ~~3.4.1. Finance Section Support Units:~~
- ~~3.4.1.1.— Compensation/Claims Unit— Responsible for financial concerns resulting from property damage, injuries, or fatalities at the incident.~~
- ~~3.4.1.2.— Cost Unit— Responsible for tracking costs, analyzing cost data, making estimates, and recommending cost savings measures.~~
- ~~3.4.1.3.— Procurement Unit— Responsible for financial matters concerning vendor contracts.~~
- ~~3.4.1.4.— Time Unit— Responsible for recording time for incident personnel and hired equipment.~~
- ~~4. Incident Command System (ICS): Position Titles~~
- ~~4.1. Incident Command System supervisory titles are important because they allow many different agencies to work together under a common organization structure. Using consistent titles ensures that personnel from different organizations have the same credentials and qualifications.~~
- ~~4.1.1. Section: The organization level with responsibility for a major functional area of incident management (e.g. Operations, Planning, Logistics, Finance/Administration). The person in charge of each section is designated as a Chief.~~
- ~~4.1.2. Division: The organizational level having responsibility for operations within a defined geographic area. The person in charge of each Division is designated as a Supervisor.~~
- ~~4.1.3. Group: An organizational subdivision established to divide the incident management structure into functional areas of operation. The person in charge of each Group is designated as a Supervisor.~~
- ~~4.1.4. Branch: An organizational level used when the number of Divisions or Groups exceeds the span of control, a Branch is charged with either geographical or functional responsibilities. The person in charge of each Branch is designated as a Director.~~

- ~~4.1.5. Strike Team: A set number of resources of the same kind and type with common communications operating under the direct supervision of a Strike Team Leader.~~
- ~~4.1.6. Task Force: A combination of mixed resources with common communications operating under the direct supervision of a Task Force Leader.~~
- ~~4.1.7. Single Resource: An individual, a piece of equipment and its personnel complement, or a crew or team of individuals with an identified supervisor that can be used at an incident.~~

<b>Organizational Level</b>	<b>Title</b>	<b>Support Position</b>
Incident Command	Incident Commander	Deputy
Command Staff	Officer	Assistant
General Staff	Chief	Deputy
Branch	Director	Deputy
Division/Group	Supervisor	N/A
Unit	Leader	Manager
Strike Team/Task Force	Leader	Single Resource Boss

## ~~5. Incident Command System (ICS): Intergovernmental Coordination Options~~

~~Emergency Operations Center (EOC)/Emergency Coordination Center (ECC): Supports the on-scene incident response by relieving the Incident Commander of the burden of external coordination and securing additional resources. An EOC is: a physical location, staffed with personnel trained for and authorized to represent their agency/discipline, equipped with mechanisms for communicating with the incident site and obtaining resources and potential resources, managed through protocols, applicable at different levels of government.)~~

~~1.9. Identify required FEMA training courses for members, commensurate with rank and position, and submit to the Chief's office for approval and distribution in a special order.~~

## ~~2. Chief's Office Responsibilities.~~

~~2.1. Designate the EMU as the single point of contact of all matters related to emergency management planning and exercises.~~

~~5.1. Ensure Incident Management Team (IMT): An IMT is an incident command organization made up of the Command and General Staff members and appropriate functional units in an ICS organization and can be deployed or activated as needed. National, State, and some local IMTs have formal certification and qualification, notification, deployment, and operational procedures in place. In other cases, IMTs are formed at an incident or for specific events.~~

~~5.2. Joint Information Center (JIC): May be established to coordinate all incident related public information activities. The JIC serves as the central point of contact for all news media. When possible, public information officials from all participating agencies should co-locate at the JIC. Upon establishment of the JIC, the Police Public Information Officer (PIO) will respond or liaison with the JIC.~~

~~5.3. Unified Command: Unified command (UC) is an important element in multijurisdictional or multiagency domestic incident management. It provides guidelines to enable agencies with different legal, geographic, and functional responsibilities to coordinate, plan, and interact effectively. In a Unified Command structure, the individuals designated by their jurisdictional authorities jointly determine objectives, plans, and priorities and work together to execute them.~~

### **History:**

- ~~Originating Directive Effective: 3/14/16~~
  - ~~Rescind:~~
    - ~~Directive 741.00, Chemical Biological and Radiological Agents and Weapons~~
    - ~~Directive 755.00, Aircraft Crash Procedures~~
    - ~~Directive 761.00, Hazardous Material Incidents~~
    - ~~Directive 762.00, Mobilization~~
    - ~~Directive 763.00, Operational Conditions (OPCON)~~
    - ~~Directive 785.00, Earthquake Procedures~~
    - ~~Directive 790.0, Evacuation Procedures~~

● ~~Next Review Date: 3/14/18~~

● ~~Review By: Emergency Management Unit~~

2.2. PPB complies with Oregon's Emergency Management NIMS compliance program.

2.3. Ensure the Bureau teaches and utilizes NIMS for all hazards and applies ICS as the standard approach to on-scene command, control, and coordination of incidents.

2.4. Develop intrastate and interagency mutual aid agreements and/or assistance agreements and ensure communications are up-to-date with the State, partnering City agencies, neighboring jurisdictions, and appropriate external organizations.

3. Business Services Group Responsibilities.

3.1. Maintain existing mutual aid agreements and assistance agreements the Bureau has established with the State and other agencies.

4. Training Division Responsibilities.

4.1. The Learning Management System (LMS) Manager shall ensure the required FEMA courses are assigned in LMS for members who need to complete them.

5. Member Responsibilities.

5.1. Newly hired members (officers) or members (officers) who are in probationary status shall complete FEMA's Independent Study (IS) 100 and IS 700 courses within one year of hire, as required by the Department of Public Safety Standards and Training, in order to receive their basic certification to be a sworn officer.

5.2. Within one year of a promotion to any rank, members shall complete additional courses as required by Oregon's Emergency Management program or directed by the Chief.

6. Supervisor Responsibilities.

6.1. Supervisors shall apply ICS as the standard approach to on-scene command, control and coordination of incidents, including incident action planning.

DRAFT

#1

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, March 18, 2020 4:58:43 PM  
**Last Modified:** Wednesday, March 18, 2020 5:08:16 PM  
**Time Spent:** 00:09:33

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**Q1** Please provide feedback for this directive

This directive seems to mirror language from FEMA that is typically used in training. I'm concerned with over-complicating policy and conflating it's utility to information that is more philosophical and "best practice" in nature. I would simplify this directive significantly in this vein, by simply implementing the language under "Policy (1, 1.1., 1.2., 2., 3.)". Section "5. Incident Command System (ICS): Intergovernmental Coordination Options" may be helpful as well, but beyond that we should just generally refer to ICS/FEMA material.

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**Q2** Contact Information (optional)

Name

Email Address

Phone Number

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#2

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, March 27, 2020 2:40:21 PM  
**Last Modified:** Friday, March 27, 2020 2:41:46 PM  
**Time Spent:** 00:01:25

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## Directive 700.00 Feedback

### Q1 Please provide feedback for this directive

#### COMMENTS ON BIAS CRIME AND NATIONAL INCIDENT MANAGEMENT DIRECTIVES, MARCH 2020

To Chief Resch, Capt. Parman, Lieutenant Morgan, PPB Policy Analysts, Compliance Officer/Community Liaison Team, Community Oversight Advisory Board staff, US Dept. of Justice, Citizen Review Committee and the Portland Police Bureau:

Below are our comments on two Directives (Bias Crimes and National Incident Management) posted for review in March at ). We are sending our comments on the Training Directive separately. Portland Copwatch (PCW) continues to have concerns about the 15-day response period for the "First Universal" reviews, and again urges the Bureau to add letters to each major section (Refer, Definitions, Policy, Procedure) and to number the definitions for easy reference. The Bias crimes Directive is still in the Bureau's old format so the changes indicated in its previous review from 2015 never got finalized.

Most of these comments come directly from our previous comments on these policies. Unless otherwise noted our comments are about the Procedure section.

#### DIRECTIVE 700.00 NATIONAL INCIDENT MANAGEMENT SYSTEM/INCIDENT COMMAND SYSTEM (previous comments January 2016)

The "About" Section of this Directive states that the Bureau's policy is to follow the National Incident Management System (NIMS) as established by presidential order regarding "Homeland Security." The date of that order should be noted, as well as the date the Bureau adopted this policy.

Our general concern with this Directive is its apparent application to crowd control situations. It would be good to know if the NIMS/Incident Command System (ICS) is regularly used on protest actions, since Policy Section 2 encourages the System's use "for all incidents of planned events [to] help improve and maintain skills needed for the large-scale incidents." We believe it is dangerous to put First Amendment events in the same category of "crisis" that the NIMS/ICS envisions. We do not think it is appropriate to use heavy-handed police tactics designed to handle the aftermath of mass murders or natural disasters on constitutionally protected gatherings. It is particularly disconcerting that this Directive even includes "planned events," since that means it doesn't matter if organizers get a permit or not, the police will treat you as if you are terrorists.

It's also alarming that there is a role for a Finance Chief and Compensation/Claims Unit which presume there will be "injury/damage to property" (Section 3.4) or "fatalities" (Section 3.4.1.1).

There are no clear definitions of the function or purpose of a "strike team" as laid out in Section 4.1.5.

Furthermore, the table laying out the names of the heads of divisions (following Section 4.1.7) actually adds confusion when it is meant to clarify. There are multiple references to "deputy" which as far as we know, aside from the Deputy Chief, is not a term used by the PPB. There is also a reference to a "single resource boss," which is a very strange term.

Our last comment here is that the concept of a "unified command" among agencies that could be federal, state and local (5.4) is a good idea to avoid confusion and conflict, but there is nothing outlining how these agencies-- which typically operate in a territorial manner-- will "jointly plan and execute" the law enforcement activities envisioned in the Directive.

We thank you again for the opportunity to comment.

**Q2** Contact Information (optional)

Name

Email Address

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#3

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, March 27, 2020 9:38:17 PM  
**Last Modified:** Friday, March 27, 2020 9:42:15 PM  
**Time Spent:** 00:03:58

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Page 1

**Q1** Please provide feedback for this directive

This directive seems overly complicated. This could be simplified by 1., 1.1, 1.2, 1.3, 1.4, 1.5, 2., 3,4, and 5. And for further, refer to ICS/FEMA. Not sure this policy needs to be 5 pages.

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**Q2** Contact Information (optional)

Respondent skipped this question

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## #4

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Sunday, March 29, 2020 3:10:38 PM  
**Last Modified:** Sunday, March 29, 2020 3:11:51 PM  
**Time Spent:** 00:01:12

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Page 1

**Q1** Please provide feedback for this directive

- Section 1.2 of "About NIMS" currently reads "concepts of interoperability reliability, scalability, and portability, as well as the resiliency and redundancy of commendations and information." There should be a comma between "interoperability" and "reliability" in order to make the author's intent clear. Also shouldn't this read "resiliency and redundancy of communications and information"? "Commendations" seems out of place with the rest of this list. If this section was drafted with speech to text software this could be an error in transcription.
  - Section 1.5 of "About NIMS" can be simplified: "Ongoing Management and Maintenance consists of two (2) components: the National Integration Center (NIC) and Supporting Technologies."
  - Section 1 of "Policy" currently reads "thus in turn." This can be simplified to "this in turn." If "thus" is an intentional word choice the phrase can be modified to "and thus in turn."
  - In Section 1.2 of "Policy" there is an extra space before the sentence "Incidents must have an action plan."
  - Section 2.1 of "Procedure" currently reads "On small incidents and events, the one person-Incident Commander – may accomplish all five (5) management functions." The comma and the hyphen are not needed and complicate the sentence.
  - Section 3.2.1.3 of "Procedure" currently reads "Establish a duplication service, files copies of all official forms and reports, provide incident information to appropriate requesters, and provide status reports to appropriate requesters." The tenses switch back and forth for some reason, unlike the other sections of this document. Corrected version: "Establishes a duplication service, files copies of all official forms and reports, provides incident information to appropriate requesters, and provides status reports to appropriate requesters."
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**Q2** Contact Information (optional)

Name

Email Address

Phone Number

#5

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Sunday, March 29, 2020 8:42:41 PM  
**Last Modified:** Sunday, March 29, 2020 8:42:48 PM  
**Time Spent:** 00:00:07

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Page 1

**Q1** Please provide feedback for this directive

-I think the whole directive is slightly repetitive and long winded. The main points are covered well but I think the directive could be tightened up and condensed.

-Under procedure, I think the bullets could be better formatted so it reads clearer. The headlines and subsections are not clearly defined and blend together as you read it.

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**Q2** Contact Information (optional)

Respondent skipped this question

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#6

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, March 30, 2020 12:39:26 AM  
**Last Modified:** Monday, March 30, 2020 12:39:52 AM  
**Time Spent:** 00:00:26

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Page 1

**Q1** Please provide feedback for this directive

The NIMS system is clearly a thorough product which defines and implements a wide variety of roles in large and small scale events. Despite this, it is also a system which finds itself rarely implemented, easily forgotten, and critically important when it does come into play. The policy as it stands does not seem to include any clarification on how the Bureau will train and keep members up to date on NIMS/ICS procedure, or what the Training Division's role is to that end.

The procedure section of the policy may benefit from more specific instruction as to who can begin establishing roles in Incident Command, when implementation of the policy is appropriate, and how leadership will be transferred as different levels of the chain of command come into play. I understand, however, the policy may be intended to serve more as an outline of the structure of NIMS and not as a guide for its implementation.

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**Q2** Contact Information (optional)

Respondent skipped this question

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#7

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, March 31, 2020 10:56:31 AM  
**Last Modified:** Tuesday, March 31, 2020 11:18:07 AM  
**Time Spent:** 00:21:35

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Page 1

**Q1** Please provide feedback for this directive

I don't find this directive helpful in terms of providing advice on how to use NIMS or ICS in a police setting. I do think some of the definitions and position descriptions are helpful, but this appears to just be a list of definitions as opposed to guidelines on how to act.

I think it would be beneficial to shorten up the definitions somewhat, limit the positions to the ones we most commonly use on an IMT activation (for example, in the Logs Section, get rid of all units except maybe the Food Unit and the Medical Unit). It might also be beneficial to add some groups or branches under the Ops Section to give people an idea of how we actually use ICS.

I would also add a section on when a written IAP is required and the minimum requirements for an IAP (maybe a 202 and a 204).

I might also add a section (maybe under the IMT definition) that specifies that the CIC and CMIC programs operate under the IMT model.

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**Q2** Contact Information (optional)

Respondent skipped this question

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#1

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, April 15, 2020 10:13:32 AM  
**Last Modified:** Wednesday, April 15, 2020 10:13:58 AM  
**Time Spent:** 00:00:26

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Page 1

**Q1** Please provide feedback for this directive

dont like it at all

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**Q2** Contact Information (optional)

**Respondent skipped this question**

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#2

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, April 15, 2020 3:51:33 PM  
**Last Modified:** Wednesday, April 15, 2020 3:53:50 PM  
**Time Spent:** 00:02:17

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Page 1

**Q1** Please provide feedback for this directive

Just some housekeeping stuff- there needs to be a space between policy 2 and policy 3. And section 1.8. formatting is off. There also needs to be a space between 1.8. and 1.9. Let me know if you have issues formatting and I can fix it for you.

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**Q2** Contact Information (optional)

Respondent skipped this question

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#3

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, April 22, 2020 5:11:57 PM  
**Last Modified:** Wednesday, April 22, 2020 5:14:07 PM  
**Time Spent:** 00:02:10

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Page 1

**Q1** Please provide feedback for this directive

The directive is clear and I have no suggestions for change. It appears to be fine in its current rendition.

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**Q2** Contact Information (optional)

Name

Email Address

Phone Number

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#4

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, April 22, 2020 6:15:30 PM  
**Last Modified:** Wednesday, April 22, 2020 6:19:15 PM  
**Time Spent:** 00:03:44

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Page 1

**Q1** Please provide feedback for this directive

I am a 11 year officer and have cant remember what I learned in the requires IMS class for my rank. Wondering if it would help to have something in the directive that would tell me where to go or what to do if I want a refresher. Or is it just assumed I would contact the training division. Maybe it doesn't need to be said. Just a thought otherwise it looks good to me!

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**Q2** Contact Information (optional)

Name

Email Address

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#5

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, April 23, 2020 9:12:14 AM  
**Last Modified:** Thursday, April 23, 2020 9:17:52 AM  
**Time Spent:** 00:05:37

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Page 1

**Q1** Please provide feedback for this directive

The section discussing written plans makes sense. My comment however, is that on incidents needing a written plan, the time used to do so is probably better spent managing the incident. For small and large incidents a Pre-written plan/framework might be advised. Having the framework plan in place to pull of bathe shelf could save valuable time and energy. In all the plan can be checklist style driven. For large incidents have fragmentation's of the plan for sub units is advisable and therefore becomes more user friendly by all involved. This was a structure used in Military based plans and worked fairly well.

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**Q2** Contact Information (optional)

Name

Email Address

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#6

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, May 14, 2020 3:36:16 PM  
**Last Modified:** Thursday, May 14, 2020 3:36:57 PM  
**Time Spent:** 00:00:41

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## Directive 700.00 Feedback

### Q1 Please provide feedback for this directive

#### COMMENTS ON NATIONAL INCIDENT MANAGEMENT DIRECTIVES, MAY 2020

To Chief Resch, Capt. Parman, Lieutenant Morgan, PPB Policy Analysts, Compliance Officer/Community Liaison Team, Community Oversight Advisory Board staff, US Dept. of Justice, Citizen Review Committee and the Portland Police Bureau:

Below are our comments on the National Incident Management Directives posted for review in April/May at ). Portland Copwatch (PCW) continues to urge the Bureau to add letters to each major section (Refer, Definitions, Policy, Procedure) and to number the definitions for easy reference.

We previously commented on this Directive in January, but the Bureau has made major changes to that earlier version. Unless otherwise noted our comments are about the Procedure section.

#### DIRECTIVE 700.00 NATIONAL INCIDENT MANAGEMENT SYSTEM (previous comments January 2020)

In our previous comments, we expressed concern that the Directive was not clear about whether the National Incident Management System (NIMS) is applied to protest actions. The new Directive is explicit about this in Policy Section 2, where the proposed draft states "The Bureau will scale its incident management based on the size of the event, from a routine police response to a larger or more complex incident, such as a protest or natural emergency/ disaster."

Now that we have this definitive answer, we urge the Bureau to take stock of what this means. Elsewhere in the Directive (Sections 4 & 5 on Training and Officer responsibility) it is noted that the training on NIMS comes from the Federal Emergency Management Agency, which has a troubled history. Moreover, Portland has shown over time that even when the federal government has certain ideas or standards, sometimes this City can find a more Portland-based solution. A great example of this is how the US Department of Justice was upset that all Portland officers receive Crisis Intervention Training since that's not part of the national model on mental health, but has now complimented Portland's unique system.

Thus, we urge the Bureau to rethink the rewritten draft so that the many specific roles officers take under NIMS will fit better for Portland situations, especially at demonstrations. As we noted in our previous comments:

We believe it is dangerous to put First Amendment events in the same category of "crisis" that the NIMS/ICS envisions. We do not think it is appropriate to use heavy-handed police tactics designed to handle the aftermath of mass murders or natural disasters on constitutionally protected gatherings. It is particularly disconcerting that this Directive even includes "planned events," since that means it doesn't matter if organizers get a permit or not, the police will treat you as if you are terrorists.

The only other previous comment that applies to this revision was our suggestion to put in the date of the presidential order which led to the creation of NIMS as part of "Homeland Security." Though the Bureau has cut that reference, the "Refer" section now clearly states the guidelines being followed are from October 2017. We appreciate this change.

Often we find that Portland Copwatch is the only entity making comments. This Directive had several commenters suggesting that the original Directive was too long. The Bureau may have taken those suggestions a bit too far as there are now broad references to following the NIMS guidelines, but not many specifics of what responsibilities are for officers of various ranks when it comes to enacting a plan for these "incidents." Perhaps there can be a happy medium so there is more transparency to the public about what officers are allowed/ expected to do so those concerned about misconduct know what is or is not permitted.

The major cuts thankfully got rid of previous items implying the Bureau expected "injury/ damage to property" or even "fatalities" at critical incidents and used the unfamiliar terms "Deputy" and "single resource boss" on laying out division head titles. We appreciate

## Directive 700.00 Feedback

critical incidents, and used the unfamiliar terms Deputy and single resource boss on laying out division head titles. We appreciate those items being cut, though it is unclear whether they remain in the underlying federal guidelines.

Once again we thank you again for the opportunity to comment.

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### Q2 Contact Information (optional)

Name

Email Address

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