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| **NFPA 1600****(2007 Edition)***Standard on Disaster/Emergency Management and Business Continuity Programs* | **NIMS Compliance Activities** | **The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act 20 U.S.C. § 1092(f)** |
| **Program Administration: 4.1**The entity shall have a documented program that includes the following; 1. Executive policy including vision, mission statement, roles and responsibilities, and enabling authority.
2. Program goals, objectives and method of program evaluation.
3. Program plan and procedures.
4. Applicable authorities, legislation, regulations, and/or industry codes of practice.
5. Program budget, project schedule, including milestones.
6. Records management practices
 | **Element 1**Adopt the National Incident Management System (NIMS) at the organizational level for all appropriate departments and business units, as well as promote and encourage NIMS adoption by associations, utilities, partners and suppliers. |  |
| **Program Coordinator: 4.2** The program coordinator shall be appointed by the entity and authorized to administer and keep current the program.  |  |  |
| **Advisory Committee: 4.3**1. An advisory committee shall be established by the entity in accordance with its policy.
2. The advisory committee shall provide input to or assist in the coordination of the preparation, implementation, evaluation, and revision of the program.
3. The advisory committee shall include the program coordinator and others who have the appropriate expertise, knowledge of the entity, and the capability to identify resources from all key functional areas within the entity and shall solicit applicable external representation.
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| **Program Evaluation: 4.4**1. The entity shall establish performance objectives for program management addressed in Chapter 4 and program elements identified in Chapter 5
2. The entity shall conduct a periodic evaluation of the program based on the objectives.
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| **General Program Elements: 5.1**1. The program shall include the elements given in Section 5.2 – 5.16, the scope of which shall be determined by the impact of the hazards affecting the entity.
2. The program elements shall be applicable to prevention, mitigation, preparedness, response, and recovery.
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| **Laws and Authorities: 5.2**1. The program shall comply with applicable legislation, policies, regulatory requirements, and directives.
2. The entity shall implement a strategy for addressing need for revisions to legislation, regulations, directives, policies, and industry codes of practice.
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| **Risk Assessment: 5.3**1. The entity shall identify hazards, monitor those hazards, the likelihood of their occurrence and the vulnerability of people, property, the environment, and the entity itself to those hazards.
2. Hazards to be evaluated shall include the following:
	* Natural hazards (geological, meteorological, and biological)
	* Human-caused events (accidental and intentional)
	* Technological-caused events
3. The entity shall conduct an impact analysis to determine the potential detrimental impacts of the hazards on the following:
	* Health and safety of persons in the affected area at the time of the incident (injury and death)
	* Health and safety of personnel responding to the incident
	* Continuity of operations
	* Property, facilities, and infrastructure
	* Delivery of services
	* The environment
	* Economic and financial condition
	* Regulatory and contractual obligations
	* Reputation of or confidence in the entity
	* Regional, national, and international considerations
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| **Mitigation: 5.5**1. The entity shall develop and implement a mitigation strategy that includes measures to be taken to limit or control the consequences, extent, or severity of an incident that cannot be reasonably prevented.
2. The mitigation strategy shall be based on the results of hazard identification and risk assessment, impact analysis, program constraints, operational experience, and cost-benefit analysis.
3. The mitigation strategy shall include interim and long term actions to reduce vulnerability
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| **Resource Management and Logistics:****5.6**1. The entity shall establish resource management objectives consistent with the overall program goals and objectives as identified in Section 4.1 for the hazards as identified in Section 5.3
2. The entity shall establish procedures to locate, acquire, store, distribute, maintain, test, and account for services, personnel, resources, materials, and facilities procured or donated to support the program
3. The resource management objectives established shall include the following:
* Personnel, equipment, training, facilities, funding, expert knowledge, materials, technology, information, intelligence, and the time frames within which they will be needed
* Quantity, response time, capability, limitations, cost, and liability connected with using the involved resources
* Resources and any needed partnership arrangements essential to the program
1. Resource management shall include the following tasks:
* Establishing processes for describing, inventorying, requesting, and tracking resources
* Activating these processes prior to and during an incident
* Dispatching resources prior to and during an incident
* Deactivating or recalling resources during or after incidents
* Contingency planning for shortfalls of resources
1. An assessment shall be conducted to identify the resource capability shortfalls and the steps necessary to overcome any shortfalls.
2. A current inventory of internal and external resources shall be maintained.
3. Donations of goods, services, personnel, and facilities, solicited and unsolicited, and the management thereof, shall be addressed.
 | **Element 15**Maintain an inventory of organizational response assets.**Element 16** To the extent permissible by law, ensure that relevant national standards and guidance to achieve equipment, communication, and data interoperability are incorporated into acquisition programs. |  |
| **Mutual Aid/Assistance: 5.7**1. The need for mutual aid/assistance shall be determined
2. If mutual aid/assistance is needed, agreements shall be established.
3. Mutual aid/assistance agreements shall be referenced in the program plan.
 | **Element 8**Participate in and promote interagency mutual aid agreements, to include agreements with the public and private sector and/or non-governmental organizations. | **20 USC 1092 § 485 (A)(2)** The working relationship of campus security personnel with state and local law enforcement agencies, including whether the institution has agreements with such agencies, such as written memoranda of understanding, for the investigation of alleged criminal offenses. |
| **Planning: 5.8** 1. Planning Process-
* The program shall follow a planning process that develops plans for the strategy, prevention, mitigation, emergency operations/response, business continuity, and recovery.
* The entity shall engage in the planning process on a regularly scheduled basis or when the situation has changed to put the accuracy of the existing plan into question.
* Where applicable, the entity shall include key stakeholders in the planning process.
1. Common Plan Elements-
* Plans shall have clearly stated objectives.
* Plans shall identify functional roles and responsibilities of internal and external agencies, organizations, departments, and positions.
* Plans shall identify lines of authority for these agencies, organizations, departments, and positions.
* Plans shall identify logistics support and resource requirements.
* Plans shall identify the process for managing an incident.
* Plans shall identify the process for managing the communication and flow of information, both internally and externally.
1. Plans-
* The program shall include a strategic plan, an emergency operations/ response plan, a prevention plan, a mitigation plan, a recovery plan, and a continuity plan.
* The plans developed shall be either individual or integrated into a single plan document, or a combination, of the two.
* The strategic plan shall define the vision, mission, goals, and objectives of the program. (See Section 4.1)The emergency operations/response plan shall assign responsibilities for carrying out specific actions in an emergency.
* The prevention plan shall establish interim and long-term actions to eliminate hazards that impact the entity.
* The mitigation plan shall establish interim and long-term actions to reduce the impact of hazards that cannot be eliminated.
* The recovery plan shall provide for short-term and long-term priorities for restoration of functions, services, resources, facilities, programs, and infrastructure.
* The continuity plan shall identify stakeholders that need to be notified, the critical and time-sensitive applications, alternative work sites, vital records, contact lists, processes, and functions that shall be maintained, as well as the personnel, procedures, and resources that are needed while the entity is recovering.
* The entity shall make appropriate sections of the plans available to those assigned specific tasks and responsibilities therein and to other stakeholders as required.
 | **Element 5**Entities will track NIMS implementation annually as part of the organization’s emergency management program. **Element 7**Revise and update plans [i.e. Emergency Operations Plan (EOPs)] and standard operating procedures (SOPs) to incorporate NIMS components, principles and policies, to include planning, training, response, exercises, equipment, evaluation and corrective actions. |  |
| **Incident Management: 5.9**1. The entity shall develop an incident management system to direct, control, and coordinate response and recovery operations.
2. The incident management system shall describe specific organizational roles, titles, and responsibilities for each incident management function.
3. The entity shall establish applicable procedures and policies for coordinating response, continuity, and recovery activities with stakeholders directly involved in response, continuity, and recovery operations.
4. The entity shall establish applicable procedures and policies for coordinating response, continuity, and recovery activities with appropriate authorities and resources, including activation and deactivation of plans, while ensuring compliance with applicable statutes or regulations.
5. Emergency operations/response shall be guided by an incident action plan or management by objectives.
 | **Element 2**Manage all emergency incidents, exercises and preplanned (recurring/special) events in accordance with ICS organizational structures, doctrine, and procedures, as defined in NIMS. ICS implementation must include consistent application of Incident Action Planning and Common Communications Plans. **Element 3**Coordinates and supports emergency incident and event management through the development and use of integrated multi-agency coordination systems (MACs). That is, develop and coordinate connectivity capability with Hospital Command Center (HCC) and local Incident Command Posts (ICPs), local 911 centers, local Emergency Operations Centers (EOCs), the state EOC and others as applicable. |  |
| **Communications and Warning: 5.10**1. Communications systems shall be established and regularly tested to support the program.
2. Communication procedures shall be established by the entity and regularly exercised to support the program.
3. The entity shall develop and maintain the capability to alert officials and emergency response personnel.
4. Emergency communications and warning protocols, systems, processes, and procedures shall be developed, periodically tested, and used to alert people potentially impacted by an actual or impending emergency.
5. The entity shall determine communication needs, provide capabilities to execute plans, and review and address the interoperability of multiple responding organizations.
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| **Operations and Procedures: 5.11*** + 1. The entity shall develop, coordinate, and implement operational procedures to support the program and execute its plans.
		2. Procedures shall be established and implemented the response to and recovery from the consequences of those hazards identified in Section 5.3 and shall address health and safety, incident stabilization, operational/ business continuity, property conservation, and protection of the environment under the jurisdiction of the entity.
		3. Procedures, including life safety, incident stabilization, operational/ business continuity, and property conservation, shall be established and implemented for response to, and recovery from, the consequences of those hazards identified in Section 5.3.
		4. Procedures shall be in place to conduct a situation analysis that includes a needs assessment, damage assessment, and the identification of resources needed to support response and recovery operations.
		5. Procedures shall allow for concurrent recovery and mitigation activities during emergency response.
		6. Procedures shall be established for succession of management/ government as required in 5.8.3.8.
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| **Facilities: 5.12**1. The entity shall establish a primary and an alternate emergency operations center, physical or virtual, capable of managing continuity, response, and recovery operations.
2. Facilities capable of supporting continuity, response, and recovery operations shall be identified.
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| **Training: 5.13**1. The entity shall develop and implement a training/educational curriculum to support the program.
2. The objective of the training shall be to create awareness and enhance the skills required to develop, implement, maintain, and execute the program.
3. Frequency and scope of training shall be identified.
4. Personnel shall be trained in the entity’s incident management system.
5. Training records shall be maintained.
6. The training and education curriculum shall comply with all applicable regulatory requirements.
 | **Element 9**Complete IS-700: NIMS: An Introduction.**Element 10**Complete IS-800: NRP: An Introduction. **Element 11**Complete ICS 100 and ICS 200 Training or equivalent courses |  |
| **Exercises, Evaluations and Corrective Actions: 5.14**1. The entity shall evaluate program plans, procedures, and capabilities through periodic reviews, testing, and exercises.
2. Additional reviews shall be based on post-incident analyses and reports, lesson learned, and performance evaluations.
3. Exercises shall be designed to test individual essential elements, interrelated elements, or the entire plan(s).
4. Procedures shall be established to take corrective action on any deficiency identified.
 | **Element 12**Incorporate NIMS/ICS into internal and external, local, regional, and state emergency management training and exercises. **Element 13** Participate in an all-hazard exercise program based on NIMS that involves responders from multiple disciplines, multiple agencies and organizations.**Element 14**Entities will incorporate corrective actions into preparedness and response plans and procedures. | **34CFR668.46 (g)(6):** The institution's procedures to test the emergency response and evacuation procedures on at least an annual basis, including—**(i)** Tests that may be announced or unannounced;**(ii)** Publicizing its emergency response and evacuation procedures in conjunction with at least one test per calendar year; and**(iii)** Documenting, for each test, a description of the exercise, the date, time, and whether it was announced or unannounced.To comply with the Clery requirement the test must meet all of the criteria in the definition. It must: * Be scheduled. You cannot say that an actual emergency situation or a false emergency alarm served as a test of your institution’s procedures.
* Contain drills. A drill is an activity that tests a single procedural operation (e.g., a test of initiating a cell phone alert system or a test of campus security personnel conducting a campus lockdown).
* Contain exercises. An exercise is a test involving coordination of efforts (e.g., a test of the coordination of first responders, including police, firefighters and emergency medical technicians).
* Contain follow-through activities. A follow-through activity is an activity designed to review the test (e.g., a survey or interview to obtain feedback from participants).
* Be designed for assessment of emergency plans and capabilities. This means that your test should have measureable goals. For example, “Everyone involved in the emergency response and notification procedures will understand his or her role and responsibility.”
* Be designed for evaluation of emergency plans and capabilities. Design the test so that, using the assessments, you can judge whether or not the test met its goals. For example, “The evacuation process accounted for/did not account for the diverse needs of all members of the campus community.”
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| **Crisis Communication and Public Information: 5.15**1. The entity shall develop procedures to disseminate and respond to requests for pre-incident, incident, and post-incident information, as well as to provide information to internal and external audiences, including the media, and deal with their inquiries.
2. The entity shall establish and maintain an emergency public information capability that includes the following:
* A central contact facility for the media.
* A system for gathering, monitoring, and disseminating emergency information.
* Pre-scripted information bulletins
* A method to coordinate and clear information for release.
* The capability of communicating with special needs populations.
* Protective action guidelines/recommendations (e.g., shelter-in-place or evacuation)
1. Where the public is potentially impacted by a hazard, a public awareness program shall be implemented.
* The entity shall develop procedures to advise the public, through authorized agencies, of threats to people, property, and the environment.
 | **Element 4**Implements processes and/or plans to communicate timely accurate information through a Joint Information System (JIS) and Joint Information Center. (JIC)**Element 17**Apply standardized and consistent terminology, including the establishment of plain English communications standards across the public safety sector. | **34CFR668.46:****(e)** ***Timely warning and emergency notification.*****(1)** An institution must, in a manner that is timely and will aid in the prevention of similar crimes, report to the campus community on crimes that are—**(i)** Described in paragraph (c)(1) and (3) of this section;**(ii)** Reported to campus security authorities as identified under the institution's statement of current campus policies pursuant to paragraph (b)(2) of this section or local police agencies; and**(iii)** Considered by the institution to represent a threat to students and employees. **(3)** If there is an immediate threat to the health or safety of students or employees occurring on campus, as described in paragraph (g)(1) of this section, an institution must follow its emergency notification procedures. An institution that follows its emergency notification procedures is not required to issue a timely warning based on the same circumstances; however, the institution must provide adequate follow-up information to the community as needed.**(g)** ***Emergency response and evacuation procedures.***An institution must include a statement of policy regarding its emergency response and evacuation procedures in the annual security report. This statement must include—**(1)** The procedures the institution will use to immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus;**(2)** A description of the process the institution will use to—**(i)** Confirm that there is a significant emergency or dangerous situation as described in paragraph (g)(1) of this section;**(ii)** Determine the appropriate segment or segments of the campus community to receive a notification;**(iii)** Determine the content of the notification; and**(iv)** Initiate the notification system.**(3)** A statement that the institution will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency;**(4)** A list of the titles of the person or persons or organization or organizations responsible for carrying out the actions described in paragraph (g)(2) of this section;**(5)** The institution's procedures for disseminating emergency information to the larger community; and**(6)** The institution's procedures to test the emergency response and evacuation procedures on at least an annual basis, including—**(i)** Tests that may be announced or unannounced;**(ii)** Publicizing its emergency response and evacuation procedures in conjunction with at least one test per calendar year; and**(iii)** Documenting, for each test, a description of the exercise, the date, time, and whether it was announced or unannounced. |
| **Finance and Administration: 5.16**1. The entity shall develop financial and administrative procedures to support the program before, during, and after an emergency or a disaster.
2. Procedures shall be created and maintained for expediting fiscal decisions in accordance with established authorization levels and fiscal policy.
3. The procedures shall include the following:
	* Establishment and definition of responsibilities for the program finance authority, including its reporting relationships to the program coordinator.
	* Program procurement procedures.
	* Payroll.
	* Accounting systems to track and document costs.
	* Management of funding from external sources.
 | **Element 6**Develop and implement a system to coordinate appropriate hospital preparedness funding to employ NIMS across the organization. |  |