



Pennsylvania Emergency Management Agency

Subject: Comprehensive Exercise Program	Number: 2003-4
Date: July 3, 2003	By Direction of: David M. Sanko, Director

I. PURPOSE

To establish a statewide policy and program for the conduct of exercises within the public safety community.

II. AUTHORITIES AND REFERENCES

- A. *Emergency Management Performance Grant (EMPG)/Department of Homeland Security (DHS)/Office of Domestic Preparedness (ODP) Annual Guidance*
- B. *Commonwealth of Pennsylvania Three-Year Statewide Domestic Preparedness Strategy, dated September 2001*
- C. *Superfund Amendment and Reauthorization Act of 1986 42 U.S.C. 11001 et seq. (SARA), as amended*
- D. *Emergency Management Services Code, 35 Pa. C.S. 7101-7707, as amended*
- E. *Hazardous Material Emergency Planning and Response Act, 35 [P.S. 6022.101-6022.307](#) (Act 1990-165), as amended*
- F. *Public Safety Emergency Telephone Act 35 P.S. 7011-7021 (Act 1990-78), as amended*
- G. *Radiation Protection Act 35 [P.S. 7110.101-7110.703](#) (PA Act 1984-147), as amended*
- H. *Radiological Emergency Preparedness Exercise Evaluation Methodology*
- I. *NUREG 0654/FEMA-REP-1, Revision 1, November 1980*
- J. *Emergency Management Directive D2001-3, Hazardous Material Response Teams in Pennsylvania, dated April 12, 2001*
- K. *Hazardous Material Exercise Evaluation Methodology (HM-EEM), Federal Emergency Management Agency, February 1992*
- L. *Guide to Exercise in Chemical Emergency Preparedness Programs, U.S. Environmental Protection Agency, May 1988*
- M. *Emergency Management Directive D2001-1, Expenditure of Act 165 Generated Revenues at the County Level, dated January 25, 2001*

N. Emergency Management Directive D2000-1, Official Enrollment of Emergency Management Volunteers, dated January 18, 2000

O. Emergency Management Directive D2003-1, Training and Test Authorization Requests, dated February 23, 2003

P. Emergency Management Directive D2000-3, Compensation for Accidental Injury Directive, dated January 18, 2000

Q. Homeland Security Exercise and Evaluation Program, Volume I: Overview and Doctrine, Office for Domestic Preparedness, dated March 2003

R. Emergency Management Circular 2003-3, Hazardous Material Emergency Response After Action Reviews and Reports, dated April 3, 2003

III. POLICY

It shall be the policy of the Pennsylvania Emergency Management Agency that the emergency management community throughout the Commonwealth of Pennsylvania engages in a continuous, challenging, comprehensive and progressive exercise program in accordance with the provisions and intents of references A through Q.

IV. EXERCISE PROGRAM

A. The exercise program in the emergency management community shall be on a four-year cycle with at least one full-scale exercise every fourth year and at least one functional exercise in each of the other three years of the cycle.

B. This program shall apply to the emergency management agencies of each county and to the emergency management agencies of those jurisdictions receiving Emergency Management Performance Grant (EMPG) and/or Department of Homeland Security (DHS)/Office of Domestic Preparedness (ODP) funds as required by references A and B. Counties should encourage participation by the local jurisdictions in this program, preferably as participants in the county exercises. Counties are also encouraged to exercise with other counties within their regional terrorism taskforce or those they may associate with in other response efforts.

C. At least one exercise each month should be performed in each county and jurisdiction receiving EMPG and/or DHS/ODP funds so that each emergency response function may be exercised at least once annually, but more frequently if deemed appropriate. Actual occurrences may be substituted for exercises. D. Additional exercises may be conducted by the counties and jurisdictions receiving EMPG and/or DHS/ODP funds as deemed necessary by each to insure that the required skills and readiness are maintained by all of the emergency response organizations.

D. The exercise programs should be developed on a cycle starting with the testing of basic skills and increasing in complexity in skills and coordination to culminate in the full-scale exercise every fourth year. The cycle should then be repeated to ensure the retention of proficiency of each organization in the basic skills.

E. All risk and support counties in the nuclear power plant safety program are to participate in the exercise program as required by references G through I. This program includes a full-scale plume phase exercise biennially and an evaluated ingestion exercise every six years.

F. All state-certified hazardous material (HazMat) response teams shall participate in the four-year exercise cycle as required by reference J. The provisions of reference J and this directive regarding substitution of actual HazMat incidents also apply. Those HazMat teams that are under contract to provide services to more than one

county need not participate in all the exercises of each county, so long as they participate in one full-scale exercise in a four-year period and one functional exercise in each of the other three years, preferably exercising with each county under contract in the four-year period. References K, L and R provide guidance on conducting HazMat exercises.

G. All counties with Medical Support One (MS-1) hospitals shall participate in the four-year exercise cycle. There are a total of 17 MS-1 hospitals servicing the five nuclear power plants in the Commonwealth. Each hospital's exercise is evaluated annually by PEMA and biennially by FEMA. This is addition to the three-hour training mandated for exercise preparation and participation.

H. Counties and jurisdictions receiving EMPG and/or DHS/ODP funds may have additional requirements/parameters placed upon them for certain types of exercises, such as outlined in reference Q. Because participants can usually include their own exercise objectives, these exercises should be incorporated into their overall exercise programs. Additional guidance for certain exercises will be provided separately, as for the annual statewide Severe Weather Emergency Preparedness Exercise.

I. Counties and jurisdictions receiving DHS/ODP exercise funds must prepare After Action Reports (AAR) for each tabletop, game, drill, functional, and fullscale exercise conducted under Reference Q. The AAR will document: performance and capture the findings-strengths and areas for improvement identified by exercise participants and/or exercise observers and evaluators. It will provide a description of what happened, issues that need to be addressed, and recommendations for corrective actions. The AAR should be forwarded to ODP, via the appropriate PEMA Regional Office and the PEMA Training Office, within 60 days of exercise completion.

J. In addition to the AAR, counties and jurisdictions receiving DHS/ODP' exercise funds must develop a Corrective Action Plan (CAP) to identify the actions taken, the timelines, and the lead agency/individual responsible to address the corrective actions identified in the AAR. The CAP should be submitted to the PEMA Training Office, via the regional office, in conjunction with the 95-44 exercise package. Updates to the CAP for each exercise should be provided with the Annual Statement of Work input each quarter.

V. GENERAL

A. Exercises are required of state and local governments as outlined in references C through F because exercises are a critical component of a well-rounded emergency management program. Properly conducted exercises will ensure a more effective response to an actual emergency.

B. The two major reasons for conducting exercises are:

- 1. Capability Assessment: To determine whether a system (equipment, plans and organization) functions as anticipated under non-routine conditions and if not, to identify actions required improving performance;*
- 2. Training: To provide people/organizations with an opportunity to practice the knowledge and skills required to carry out non-routine functions and/or identify areas in which current knowledge and skills are inadequate.*

C. Exercises are the most effective way of determining actual operational response capabilities as compared to management expectations.

D. Exercises tend to motivate local decision makers to allocate resources to emergency management by illustrating the complexity and potential impact of emergencies.

E. Exercises should be a part of the normal functioning of an organization and should be included in the yearly budget as a routine cost of doing business. (Grant funds may also be a source of funding for exercises/training.)

F. The conduct of exercises may result in a public safety volunteer being injured. When such an injury does occur, the emergency management volunteer may be entitled to receive benefits as referenced in D and if the requirements referenced in N through P are met.

G. The focus of each exercise should be on the emergency response functions, i.e., communications; energy; food; firefighting; hazardous materials; health and medical; information and planning; mass care; public works and engineering; resource support; transportation; and urban search and rescue. Each functional area should be exercised at least once each year, either separately or as part of a major exercise.

H. The primary exercise scenarios should be rotated over the three types of hazards, i.e., natural hazard, national security and technological/man-made hazards.

I. Exercises should be built logically one on another, progressively increasing the skill levels and stress during the four-year exercise cycle. For example, a series of tabletop exercises to test a single skill or procedure would progress to a functional exercise to test a complex activity and would culminate in a full-scale exercise to demonstrate the full response capability.

J. Exercising must be continuous to insure that skills and readiness are maintained in view of changes in plans, improved resources, personnel changes and new challenges.

K. Because of the inherent costs in time, personnel, resources and political concerns, each exercise must be well planned to meet a specific purpose.

L. Some benefits of a well designed exercise program include:

- 1. Development of proficiency and competence of participants;*
- 2. Testing of plans and procedures in "live" situations;*
- 3. Enhancement of community capabilities for emergency response;*
- 4. Enhancement of public information proficiency;*
- 5. Improved cooperation among government agencies and the private sector;*
- 6. Increased public awareness;*
- 7. Improved public policies regarding community readiness.*

M. To be effective, an exercise must be thoroughly and accurately evaluated against measurable expected standards. Evaluations will reveal deficiencies in plans, inadequacy of resources and the need for remedial training, which are the basic reasons for conducting exercises.

N. A decision not to exercise, or laxity in the conduct of exercises, involves substantial risks that are unacceptable in an ever-changing world. Participants may not thoroughly understand their roles, coordination with other activities may be lacking, equipment may not function as expected or procedures may not be as effective as anticipated.

VI. DEFINITIONS

A. Tabletop Exercise: *A tabletop exercise simulates an emergency situation in an informal, stress-free environment. It is designed to elicit constructive discussion as participants examine and resolve problems based on existing plans, policies and coordination. There is minimal simulation, no utilization of equipment, no deployment of resources, and no time pressures. A tabletop exercise should test a single emergency response function. The success of an exercise is measured in a large part by the level of group participation.*

B. Functional Exercise: *A functional exercise is a fully simulated, interactive exercise. It tests capabilities to respond to a simulated emergency testing of emergency management functions. A functional exercise should include a minimum of four of these functions. It is a coordinated response to an emergency in a compressed timeframe with a realistic simulation. It focuses on policies, procedures, roles and responsibilities. The participants respond to realistic, simulated situations injected into the exercise.*

C. Full-Scale Exercise: *A full-scale exercise is as close to a real disaster as possible. It is a field exercise designed to evaluate the operational capability of emergency management systems in a highly stressful environment that simulates actual response conditions. It requires the mobilization and actual movement of emergency personnel, equipment and resources and should be designed to test the majority of the emergency response functions. It coordinates the actions of several agencies and tests the majority of the emergency management functions. Realism is achieved through on-scene actions and discussions.*

D. Actual Occurrence: *Non-routine incident which involves significant response of emergency response personnel and equipment. Partial or full activation of the Emergency Operations Center is required to receive exercise credit. It can be used as a substitute for the monthly exercise requirement if above criteria is met and proper documentation submitted.*

E. Natural Hazard: *A natural hazard is a phenomenon of nature resulting in a disaster or potential disaster (e.g., tornado, flood, landslide, subsidence, earthquake, drought, winter storm, wild fire).*

F. Technological Hazard: *A technological hazard is a man-made phenomenon resulting in a disaster or potential disaster (e.g., radiological incidents, structural fires, transportation accidents, dam failures, hazardous materials incidents).*

G. National Security: *A national security incident is one that threatens the national security of the United States through an attack, sabotage with, or accidental discharge of, a weapon employed conventionally or unconventionally.*

H. Weapons of Mass Destruction (WMD, Incidents): *The use of biological, chemical or radiological agents and/or materials or nuclear weapons by terrorists to threaten the national security of the United States.*

VII. ASSIGNMENT OF RESPONSIBILITIES

A. PEMA – Bureau of Operations and Training (BOOT)

1. Establish and manage a statewide four-year cycle exercise program for the public safety community.
2. Provide technical assistance and resource allocation as available to the counties to assist in the county exercise program.

3. Manage the reporting process for the exercise program.
4. Provide training courses as necessary on exercise design and evaluation.
5. Monitor the PEMA Exercise Reporting System or follow-on systems to discover trends and to identify shortfalls in training, planning or resources.
5. Coordinate with the regional offices to ensure that the CAPS are being tracked and corrective actions have been performed.
6. Track the PEMA Headquarters CAPs and ensure that corrective actions have been performed.

B. PEMA Regional Offices

1. Assist in the development, administration and coordination of the exercise program in the counties.
2. Develop, conduct and evaluate the certification exercises required in the certification program for emergency management coordinators.
3. Assist in the review process of the exercise reports, including recommendations regarding the validity of substituting actual occurrences for exercise credit.
4. Provide assistance to the counties in overcoming any shortfalls/deficiencies revealed by the exercises
5. Track the CAPS and ensure that corrective actions have been performed.

C. County and Municipal Emergency Management Coordinators

1. Using the basic requirements of the four-year cycle exercise program described herein, in conjunction with the Regional Offices, develop a comprehensive exercise program for the county/municipality. Only municipalities who receive federal funding as described previously fall under this requirement. Other municipalities are encouraged to participate in the county's exercise program.
2. Start each four-year exercise program cycle with basic requirements and progress in complexity to culminate in a full-scale exercise, and then repeat the process in another four-year cycle, culminating in a full-scale exercise of a different nature.
3. Add the number and types of exercises to the basic program to reflect the priority of needs of each county/municipality.

4. Place emphasis on the most critical needs by the frequency of exercising each emergency response function beyond the basic requirements.
5. Encourage and assist the municipalities in developing an exercise program, including assisting them in conducting their own exercises and/or incorporating them into the county exercise program.
6. Distribute a copy of this directive to the county Local Emergency Planning Committee (LEPC) and the county HazMat team(s).
7. Coordinate with the county LEPC regarding the requirements to exercise the SARA facility plans and the county HazMat team(s) as addressed herein and in reference M.
8. Coordinate with the county or contracted certified hazardous material teams to insure required exercises are conducted as addressed herein and in reference J
9. Ensure remedial training or other actions are taken without delay to rectify any shortfalls revealed in the exercises.
10. Submit the reports required by Section IX below and any other required reports upon request.

VIII. .REPORTS

A. *County/Municipal Emergency Management Coordinators*

1. All county emergency management agencies and those municipalities that receive EMPG and/or DHS/ODP funds are to submit to PEMA, Bureau of Operations and Training, via the appropriate Regional Office, a four-year exercise plan.
2. This four-year exercise plan is to be developed in accordance with the guidance provided in this directive.
3. The exercise plan is to include the month each exercise is scheduled; the response organization to be exercised, the type of exercise and the hazard scenario (see Section VI, above).
4. The exercise plan is to be reviewed every six months and revised, if necessary. Revisions should be based on the exercises conducted, actual emergencies for which exercise credit has been given, and new requirements or emphasis. The semi-annual revision is to be submitted with the second quarter Annual Statement of Work Report annually. Negative reports are to be submitted if appropriate.
5. Annually, in addition to the six-month revision, an exercise plan for the next sequential FFY is to be developed. This new plan, which will update and modify the remaining three years in the current plan and add an exercise plan for a new FFY is to be submitted to the appropriate Regional Office by September 1.
6. For each exercise, submit an exercise report on FEMA Form 95-44 (February 1993) Emergency Management Exercise Reporting System, or subsequent superseding form, documentation, After Action Report, Corrective Action Plan and the Training Authorization Request Form (PEMA-TAR-1) in accordance with instructions provided separately.

7. Assist municipalities in the county in preparing FEMA Form 95-44 for exercises conducted.

8. Submit all reports to PEMA Bureau of Operations and Training through the appropriate Regional Office.

B. PEMA Regional Offices

1. Review all reports submitted by the counties and municipalities for accuracy and completeness, returning those requiring corrections or additional documentation, and forwarding completed reports to PEMA Bureau of Operations and Training. Regional offices should add their concurrences and approval on all 95-44s submitted to them from the counties for actual events to ensure the event meets established criteria for exercise credit. If the event does not satisfy the criteria for exercise credit, the PEMA regional trainer will annotate the 95-44 recommending disapproval.

C. PEMA Bureau of Operations and Training

Effect all the reporting and records keeping requirements of the PEMA Exercise Reporting System.

IX. STATE AGENCIES

State agencies and their field offices play a key role in the operation of the state Emergency Operations Center (EOC), Disaster Field Office (DFO), Disaster Recovery Centers (DRC) and Damage Survey Teams (DST) during natural hazard, technological hazard, national security exercises and actual disaster operations. Each state agency has established procedures for the rapid alert, notification and assembly of key personnel, equipment and resources when the Director of PEMA calls for such services as the result of actual occurrences or under exercise conditions. In cooperation with PEMA, state agencies conduct the following exercise-related activities:

A. Develop, maintain and test plans to support natural hazard, technological hazard and national security emergency response actions as the missions are assigned in the state emergency operations plan.

B. When called, participate in all state exercises.

C. Maintain records and reports during actual incidents and exercises, prepare after-action reports, corrective action plans, and participate in critiques.

D. Establish and maintain liaison with all entities of government either through regional office or via direct contact through headquarters and field office participation in exercises.

X. RESCISSION

A. Comprehensive Exercise Program Directive D2002-1, dated July 30, 2002, is hereby rescinded.

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