

Kansas Planning Standards

Foreword

A goal of the Kansas Division of Emergency Management (KDEM) is to develop, in partnership with county and Federal governments, an Integrated Emergency Management System (IEMS) that is responsive, risk-based, and all-hazards in approach. Vital to this system are Emergency Operations Plans (EOPs), which document policies for accessing and allocating resources to supplement operational needs at the local and State level.

The Kansas Planning Standards (KPS) is intended to be an all-encompassing guide to review or redevelop Local Emergency Operations Plans (LEOPs). It includes the planning requirements from the National Response Team (NRT-1A), the Nuclear Regulatory Commission (NUREG 0654), and the most recent suggested considerations from the Federal Emergency Management Agency (FEMA's SLG-100, and the Emergency Planning Job Redesign, March 1996).

The KPS provides local emergency managers, and local planning teams, with information on the State of Kansas= concept on developing EOPs. This standard clarifies the mitigation, preparedness, response and recovery planning elements that warrant inclusion in LEOPs. The KPS is only a part of an integrated planning process which requires determining best judgement and implementing policies on dealing with all phases of a disaster.

The KPS encourages Local Emergency Planning Committees (LEPCs) to address all hazardous materials issues that threaten their jurisdiction in a single EOP instead of relying on separate plans. The coordination of all local planning efforts is key in eliminating duplication and conflict between plans. This alliance contributes to the creation of a strong local planning structure, inclusive of all governmental agencies with response/recovery functions, volunteers, and the private sector.

Several counties in Kansas must plan for radiological emergencies because of their proximity to nuclear power plants. Other counties may choose to include peacetime radiological considerations for reasons identified in their hazard analysis.

The KPS will assist local and State officials in forging a partnership focused on the following:

- Effective and efficient response to any hazard that threatens your jurisdiction.
- Integration between State Emergency Operations Plans and Local Emergency Operations Plans.
- Coordination among local, State, and Federal governments during catastrophic disaster situations.

KDEM welcomes your recommendations on these standards, to better serve the needs of your jurisdiction.

Plan Format and Content

FORMAT

The Kansas Planning Standards (KPS) does not require Local Emergency Operations Plans (LEOPs) to follow any one particular document format. Counties have the option of continuing to use the original FEMA format for their own LEOPs, or develop a new one.

The Kansas Division of Emergency Management, Planning and Technological Hazards Sections, in reviewing LEOPs will assess the following factors:

Organization of Data

As public documents, LEOPs should be formatted in a way that information can be found in a logical and expedient manner. That format should be consistent throughout the document.

Uniformity of Terms

Technical and professional terms and acronyms should be used consistently throughout the document. The complete term should be spelled out before the first time an acronym is used. We suggest this method is used in every annex of the Plan, to facilitate group revisions of the plan.

Executive Summary

It is beneficial to include a summary of the jurisdiction's emergency management system at the beginning of the LEOP. This summary should be an overview of functions and topics expanded in the rest of the Plan. Most existing LEOPs, developed after the FEMA format, accomplish this through the Basic Plan.—s emergency management system at the beginning of the plan.

Evaluation

Each function included in the KPS is followed by an evaluation requirement. Its purpose is to help local government officials and the State of Kansas determine the existing level of readiness to respond to and recover from, disasters.

Corrective Action Plan

This requirement addresses the local initiatives or plans to overcome the shortfalls in different emergency management functions. A brief discussion of possible short and/or long term solutions, and a projection of the capabilities to implement that plan, is expected.

Attachments

All attachments included in the plan should be numbered and reference in the narrative section.

References

The LEOP should include a list of documents used to develop/review the LEOP. This list should include publications which the document the policies included in the Plan.

Authorities

The KPS requires that all local, State and Federal authorities which mandate the development, maintenance and exercise of the LEOP be included. Other pertinent authorities are agreements and departmental policies which may affect emergency operations.

Index

Include a listing of topics, and/or sections of the plan, and related page numbers where that information may be found.

CONTENT

The KPS includes both content requirements and suggestions. The requirements originate from Federal and State laws. *All of these items must be addressed in the LEOP. If a particular capability or resource does not exist in your jurisdiction, your Plan only needs to explain that*

requirement is not applicable, and why. If the requirement is about procedural information found in another document such as Standard Operating Guides, resource inventories, or facility plans, there is no need to duplicate that information in the LEOP. The KPS requires, however, that reference to that document be made in the LEOP.

It is strongly recommended that all established policies which influence emergency management activities, during mitigation, preparedness, response and recovery phases, should be included in the Plan.

THE PLANNING PROCESS

THE EMERGENCY MANAGEMENT COORDINATOR

The Emergency Management Coordinator is responsible for leading the local planning process. The following steps serve as guidance for local emergency staff to complete before the beginning of the planning process.

- *Become familiar with the Local Emergency Operations (LEOP).* Verify the date of the last review with the Kansas Division of Emergency Management, Planning Section. Identify LEOP's distribution list and contact plan holders to verify the date of their copy. Most existing LEOPs include a distribution list at the beginning of the document.
- *Become familiar with the local Hazardous Materials Plan.* Verify the date of the last review with the Kansas Division of Emergency Management, Technological Hazards Section. Most of the LEOPs in the State of Kansas include a "hazard specific" annex related to hazardous materials, which was intended to be a brief summary of the information contained in the local Hazardous Materials Plan. Confer with the Local Emergency Planning Committee (LEPC) to establish a schedule for the annual review of the plan, and review evaluation of community resources for exercising and implementing the plan. A main objective of the KPS is to combine both these plans, to avoid duplication of efforts and to fully utilize all local resources in the planning process.
- *Become familiar with the State of Kansas Emergency Operations Plan (SEOP).* This Plan establishes the response system and mechanism for providing State and Federal assistance to local jurisdictions. It also provides a link to the Federal Response Plan (FRP). Specific information includes the type of assistance and resources available through its implementation. The SEOP should be used as reference in the review of the LEOP.
- *Review of the local exercise program.* Identify the schedule and types of exercises conducted in the jurisdiction, and the after-action reports completed. Identify, in consultation with the LEPC, the impact these exercises and after-action reports had in the LEOP, recognizing that these types of activities are conducted to assess the validity of the Plan itself. Verify information with the Kansas Division of Emergency Management, Exercise Training Officer.
- *Review your jurisdiction's disaster history.* Local newspapers or libraries are a good source of information. Involve the LEPC in the research process. Review historical documents kept in the local emergency management/preparedness office. The offices of the County Treasurer, County Engineer/Road and Bridge Department, and County Appraisers would have information on damages and any external funding received. Talk to local senior citizens groups, and insurance companies.
- *Review your jurisdiction's Hazard Analysis.* The hazards affecting a geographic location do not change often. The probability of, and vulnerability to, each of the different hazards depends on historical occurrences, and changes in infrastructure and land use and management policies. The LEPC should also be involved in this process.

➤ *Identify agencies included in the Local Emergency Operations and Hazardous Material Plans.* Those governmental agencies, private sectors, volunteer and professional organizations with special resources or needs should be included. Establish with the LEPC a plan to contact each of these agencies/organizations before the planning process starts, and ask them to advise you of other organizations that should be involved.

➤ *Identify individual participants previously assigned to the update of LEOP and Hazardous Materials Plan.* Verify their names and positions, and become familiar with their background, and expertise for contributing to the planning process, and if possible, their emergency management training. There are home study courses, and State sponsored courses available that would facilitate the planning process

➤ *Assess elected officials' familiarity with the LEOP and Hazardous Materials Plan.* The responsibility for the safety of the residents of your jurisdiction ultimately lies with the Board of County Commissioners. Changes in the commission membership warrant a reintroduction of LEOP for their evaluation and input.

DEVELOPING A PLANNING TEAM

The planning team must involve all agencies that have a role in disaster mitigation, preparedness, response and recovery. The LEPC membership provides a core nucleus for such a team. The team may include an executive committee and advisory committees. The members of the Planning Team should:

- Be knowledgeable of their organization's disaster management responsibility.
- Be empowered to speak for their organizations.
- Be able to bring about change in their organizations.
- Have good communication and organizational skills.

EVALUATING THE LOCAL EMERGENCY OPERATIONS PLAN

An effective Emergency Operations Plan:

- Represents the way agencies, operational personnel, and other organizational elements, related to emergency management, actually function in an emergency.
- Is so well known that the plan itself may not be needed during the response phase. Personnel will have to use only the implementing documents during the disaster response phase.
- Serves as a blue print for coordinating response to any type of disaster, including those caused by unanticipated hazards, with varying levels of severity.
- Captures the relationships of key players in the community, to give personnel information on what responsibilities/functions they should perform while managing an incident.

- Captures and reflects the actions of key players and documents the key players' understanding of, and agreement with, the policies included in the plan.
- Identifies the key players, and their backups, to ensure continuity of government functions.
- Produces a coordinated response by linking agencies, operations, functions, and responsibilities, and other related emergency management elements during an incident.
- Includes a maintenance element composed of:
 - ☑ Scheduled exercises.
 - ☑ Review of actual events.
 - ☑ Scheduled annual review.
 - ☑ Scheduled review of community resources to implement the plan.
- Reflects the scope and depth of all identified hazards, and all phases of emergency management.

PROJECT MANAGEMENT GUIDE

The review of a local Emergency Operations Plan can be a complex, time-consuming project. Many factors play an important role significantly reducing the workload of the local emergency management staff. The following items are intended to assist you during the update of your Plan.

➤ **Remember:** The Local Emergency Operations Plan represents the jurisdiction's approach and commitment to emergency management. It documents the intent of elected officials to mitigate, prepare for, respond to, and recover from disasters. It bears the support of each of the governmental agencies, business, volunteer and professional organizations with emergency responsibilities in the jurisdiction. For these reasons alone, the review of the local Emergency Operations Plan is expected to be a coordinated effort, involving representatives of each of the agencies/organizations included in it.

➤ **Support:** Because the review of the Plan requires a commitment of resources, most importantly time, it is usual to find some resistance to participate in the process. The most meaningful show of support toward this project will come from the local elected officials. It is important to evaluate their perception about, and experience with, emergency management in general. We suggest you begin the process by inviting your local elected officials to a Public Officials Conference. For additional information on scheduling a conference contact KDEM's Training Section.

➤ **Coordination:** The coordination of the plan review is one of the most important responsibilities of the local Emergency Management Coordinator during this process. Representatives from other agencies will look to the coordinator for guidance on how to proceed with the plan review.

Other responsibilities may include: host and/or facilitate meetings, ensure appropriate meeting notifications are made, provide information and additional references, coordinate and distribute the final draft of the Plan.

► **Participation:** Planning Team members should be expected to actively participate in the review of the plan. We recommend that emergency functions be linked with the agency(is) primarily responsible for that type of service. The representative for that agency will then be responsible for hosting and coordinating the meeting(s) required to review and update the information related to that function/annex.

Every representative to the Planning Team, whether from a county agency, private business, volunteer or professional organizations, will bring expertise in their own field of work. However, their background and proficiency may not include emergency management. *Staff from the local Emergency Management Agency should participate in the review of every function/annex to help facilitate the process.*

Local Emergency Planning Committee's (LEPC) Participation: The Kansas Planning Standards advocated the participation of the LEPC in the review of the entire Plan. Although the LEPCs focus on planning for disasters involving hazardous materials, the response to such disasters may require the activation of every function described in the KPS. *The LEPC is responsible for ensuring all necessary hazardous materials considerations are included in the integrated Plan.*

► **Preparing for the Initial Meeting:** This meeting will set the stage for the type of cooperation that you will receive.

Before this meeting, a welcome letter should be sent to each representative appointed to the Planning Team. Ideally, this letter should be signed by the Chair of the Board of County Commissioners. It should explain the expectations of each team member, and clarify the responsibilities of the local Emergency Management Coordinator relative to the review process.

An **agenda** describing the date, time, location and topics of this first meeting should accompany the welcome letter.

Because the Plan review will require a number of different meetings, we recommend the local Emergency Management Coordinator prepare in advance a tentative **project schedule**. The project schedule should include exercise activities during the Plan review process, such as orientations and tabletop exercises, a deadline for completion of draft annexes, a deadline for the first and final draft of the Plan. It is important that this schedule be shared with the Planning Team members at the beginning of the review process.

► **Hosting the Initial Meeting:** The local Emergency Management Coordinator, as host of this meeting, should be prepared to answer questions about the Plan itself, and the proposed project schedule. The integration of the local Exercise Program and the planning process can begin by designing the initial meeting as an orientation activity. By the end of the initial meeting, the participants should have the following information:

Designation of Annex/Function Review Leader: This individual is responsible for leading the subcommittee members in group discussions. This person is also responsible for coordinating necessary meetings, notifying subcommittee members, and ensuring the preparation of a final draft of the annex. The annex/function review leader should confirm that the information in the annex does not contradict the information in the Basic Plan (or Executive Overview section).

Designation of Subcommittee Members: A representative from every organization that provides support to a particular emergency function should be a part of the subcommittee that reviews the applicable annex.

Tasking to Research Authorities: All planning team members are responsible for researching, and providing copies of, all authorities pertinent to their agency/organization, in relation to emergency operations, to reference as documentation in the plan.

Tasking to Provide Standard Operating Guides: All Planning Team members are responsible for providing a copy of existing Standard Operating Guides, procedures, or emergency plans of their individual organizations.

Tasking to Research Agreements: All Planning Team members are responsible for researching, and providing copies of, agreements in place to augment their own resources, or provide assistance to other agencies.

Tasking to Provide Needs and Resource Information: All Planning Team members are responsible for providing information on the status and availability of their resources, and information on the type of needs of their own organization which may affect emergency operations.

Initial Sub-Committee Meetings: The local Emergency Management Coordinator is responsible for ensuring that every subcommittee sets a date and time for their initial meeting. The leader of each sub-committee is responsible for making arrangements for timely notification of the location and drafting an agenda before the meeting.

Note: Most of the Planning Team members will be a part of one or more subcommittee. The staff from the local Emergency Management Agency is responsible for maintaining and publishing a schedule of all subcommittee meetings.

INTEGRATING THE PLANNING AND EXERCISE PROGRAMS

As the Planning Team to review Local Emergency Operations Plans (LEOPs) is formed, the same team approach should also carry a mission for developing an exercise schedule. This integration will ensure that the product is a realistic, tested and proven Plan, that reflects the specific needs of the jurisdiction.

The local Emergency Management Coordinator is responsible for leading both the planning and the exercise development process. The following recommendations are offered as guidance to utilize the Plan review process as the beginning of the exercise development process.

➤ Identify individuals within the emergency response community and the Planning Team that have either experience and/or training in exercise design and evaluation, or an interest in becoming involved in these activities. Because exercises are often designed to

reveal planning deficiencies, it is necessary to bring together a team motivated and tactful in bringing about positive change. It is beneficial for members of the Exercise Design and Evaluation Team to be familiar with the LEOP.

➤ Verify the level of experience the Exercise Design and Evaluation team members have. Community members come to the group with various backgrounds and degrees of experience. Encourage these team members to attend the Exercise Design and Evaluation courses offered by KDEM, to ensure everyone is familiar with the process.

TYPES OF EXERCISE ACTIVITY

➤ **Orientation:** Designed as an information seminar, an orientation can serve dual purposes of: 1) familiarization with the planning process, and 2) motivation toward creating an end product. It is relatively easy to conduct, but requires good planning and effective briefing skills.

An orientation would be very helpful to conduct in the beginning stages of the planning review process. Depending on target audiences, orientations can take on various formats, and be conducted as often as necessary.

Advantages	Disadvantages
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Little or no cost involved; <input checked="" type="checkbox"/> Modest time commitments; <input checked="" type="checkbox"/> Quick method to brief persons or Organizations on unfamiliar topics 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Only covers broad topics

➤ **Drills:** The effectiveness of a drill is its focus on a single, or relatively limited, portion of the overall emergency management system. Designed as an activity to test, develop, or maintain certain skills, a drill usually involves actual field responses and is considered more as a method for hands-on training.

Conducting a drill would be helpful when the aim is toward testing a single function when the plans for that function have been rewritten. Because it can be done on a small scale, it can aid in determining the effectiveness of annex re-writes before they are officially adopted.

Advantages	Disadvantages
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Allows for a single system to be isolated and analyzed in-depth; <input checked="" type="checkbox"/> Modest commitment of time, cost, and resources; <input checked="" type="checkbox"/> Easiest to design; 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Does not test integrated systems= capabilities; <input checked="" type="checkbox"/> Difficult to overload system and find weaknesses; <input checked="" type="checkbox"/> Provides capability to evaluate only a segment of the response system.

<input checked="" type="checkbox"/> Provides hands-on training to practice rewritten functions	
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➤ **Tabletop:** This type of exercise is usually an informal process that brings out constructive discussions around simulated emergency situations. The format of a tabletop exercise leans more toward a problem solving discussion rather than rapid, spontaneous decision-making. Roles and responsibilities can be clarified, and participants have an opportunity to practice working as a team.

A tabletop exercise would be best utilized when attempting to examine and then resolve known problems based on existing LEOPs. Because response efforts require a coordinated response from various agencies and individuals, involving them while resolving planning issues will guarantee the best possible solutions, and create ownership to the Plan.

Advantages	Disadvantages
<input checked="" type="checkbox"/> Modest commitment of time, cost and resources; <input checked="" type="checkbox"/> Effective method for reviewing plans and implementing the change process; <input checked="" type="checkbox"/> Educational device to acquaint appropriate personnel with emergency responsibilities and procedures; <input checked="" type="checkbox"/> Acquaints emergency personnel with each other on a personal basis.	<input checked="" type="checkbox"/> Does not provide a true test of system's capabilities; <input checked="" type="checkbox"/> Exhibits a minimal amount of realism; <input checked="" type="checkbox"/> Difficult to demonstrate system overload.

➤ **Functional:** This is an activity designed to test or evaluate the capability of an individual function, or complex activity within a function. It simulates the reality of operations in any functional area(s) to the maximum degree.

Conducting a functional exercise is applicable when updated plans are capable of being effectively evaluated.

Advantages	Disadvantages
<input checked="" type="checkbox"/> Maintains an intense degree of realism; <input checked="" type="checkbox"/> Intended to test capability of entire emergency management system; <input checked="" type="checkbox"/> Modest commitment of time, cost, and resources.	<input checked="" type="checkbox"/> Scenario development can be difficult <input checked="" type="checkbox"/> Can be difficult to acquire appropriate equipment to enhance realism.

➤ **Full-scale:** A full-scale exercise involves the testing of a major portion of the basic elements existing within LEOPs, and demonstrates true operational capabilities. These types of exercises do not substitute for simulation, rather they complement it. As a result, these activities greatly expand the scope and visibility of the emergency management community.

Done well, these exercises can improve public visibility and credibility. On the other hand, a poorly constructed exercise can jeopardize the entire program. Full-scale exercises are most beneficial when a certain degree of confidence in the LEOP has been displayed.

Advantages	Disadvantages
<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Increased realism and greater stress; <input checked="" type="checkbox"/> Greater opportunity to evaluate integrated communication capability; <input checked="" type="checkbox"/> Ability to evaluate mobility of resources and first responder capability; <input checked="" type="checkbox"/> This exercise has the ability to test coordinated integrated response of entire emergency management system. 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Additional cost involved; <input checked="" type="checkbox"/> Greater chance of losing communication containment; <input checked="" type="checkbox"/> Increases chance of mistaking exercise for actual emergency; <input checked="" type="checkbox"/> Additional emphasis on safety/liability issues; <input checked="" type="checkbox"/> Requires time commitment and a level of expertise to properly implement.

Developing an exercise program to adequately test newly revised LEOPs involves similar skills and tasks as planning other parts of the emergency program. It involves determining through a needs assessment what your long range goals are, and then develop objective-driven exercises which support these goals. This is best accomplished through an exercise cycle which incorporates an effective evaluation process that allows you to build on each succeeding exercise activity.

TECHNOLOGICAL HAZARDS

CHEMICAL EMERGENCIES

As mentioned in the FOREWORD, the Kansas Planning Standards (KPS) include the requirements from the National Response Team (NRT-1A) guidance. The Local Emergency Planning Committee (LEPC) is responsible for participating in the review of the LEOP, to ensure that all HAZMAT considerations required by Federal and State laws are integrated into the Local Emergency Operations Plan. If a county does not have an

active LEPC, the responsibility for meeting hazardous materials planning requirements reverts to the county elected officials.

The flask symbol is used throughout the KPS to highlight items that include HAZMAT considerations.

RADIOLOGICAL EMERGENCIES

NUCLEAR ATTACK

The State of Kansas is no longer emphasizing nuclear attack considerations in State and Local Emergency Operations Plans. The focus is being directed toward emergency planning preparation for the hazards most likely to affect the jurisdictions in the State.

FALLOUT SHELTER PROGRAM

The Federal program which provided for training and funding toward fallout shelter inspections has not been in effect for several years. Consequently, the capability for inspecting and certifying shelters that offer fallout protection in the State of Kansas has been eliminated. The Kansas Division of Emergency Management (KDEM) regards the existing shelter inventories as invalid. Most of these structures have undergone numerous structural modifications making it impossible to endorse them as sound fallout shelters. KDEM strongly discourages the utilization of the Fallout Shelter Inventories for nuclear attack scenario planning.

PEACETIME RADIOLOGICAL PROTECTION

Kansas maintains an aggressive training program in radiological monitoring, response and incident management.

KDEM Supports all counties within the Ingestion Pathway Zone of the Wolf Creek Nuclear Generating Station or Cooper Nuclear Power Plant as required by the Nuclear Regulatory Commission (NRC), the Federal Regulatory Commission (NRC), the Federal Emergency Management Agency (FEMA), and Kansas Statutes. Those counties include:

Wolf Creek Generating Station:

<i>Allen</i>	<i>Franklin</i>	<i>Neosho</i>
<i>Anderson</i>	<i>Greenwood</i>	<i>Osage</i>
<i>Bourbon</i>	<i>Linn</i>	<i>Shawnee</i>
<i>Chase</i>	<i>Lyon</i>	<i>Wabaunsee</i>
<i>Coffey</i>	<i>Miami</i>	<i>Wilson</i>
<i>Douglas</i>	<i>Morris</i>	<i>Woodson</i>

Cooper Nuclear Power Station:

Brown Doniphan Marshall Nemaha

The tri-blade symbol is used throughout the planning standards to highlight items that may have radiological implications.