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Crisis Communications Plan

Introduction

The landscape associated with emergency response is continuously changing. Recent events demonstrate that crisis communications are needed in a myriad of situations, including those the Agency has yet to encounter. A crisis communications plan should be forward thinking; imagining and planning for the full spectrum of situations. Recent events also demonstrate that even relatively localized incidents can attract national attention and that the best course of action to communicate the Agency's response is not determined by the type or scale of the incident.¹ Therefore, it is important that all incident response communications follow basic parameters that can be applied regardless of the incident type or scale. The information provided during an incident must be understandable, timely, accurate, and consistent. This updated plan incorporates principles to enable the Agency to achieve a more nimble framework for effective crisis communications.

During an incident, requests for information from the public and the media, as well as from the White House, members of Congress, and local, state, tribal and trust territory officials, start immediately and continue throughout the response. Efficient information flow is critical to meeting public information needs, and the responsibilities of those gathering, organizing and releasing this information must be clearly identified and coordinated through a well-defined process. This document provides a Crisis Communication Plan (the Plan) that is scalable, flexible and adaptable. The Plan relies on a collaborative communication approach involving response and public affairs staff, as well as agency leadership, and provides for the coordination of information obtained from a federal response to save lives, minimize damage, and help with long-term community and economic recovery.

Purpose and Scope

This Plan establishes the EPA's process for communicating environmental information to the public and coordinating public information among the EPA's field operations, regional offices and Headquarters during a response. It establishes roles and responsibilities to effectively integrate EPA's public affairs and emergency management activities during an emergency response to ensure that public dissemination of information about a response is understandable, timely, accurate, and consistent. While this Plan is scalable, flexible and adaptable to the needs of a specific incident response, the principle of collaboration between the public affairs and emergency management personnel always applies.

This Plan complies with the EPA's agency-wide National Approach to Response (NAR) policy and supports the Agency's efforts under the National Response Framework (NRF) when it is designated as a lead or support agency. The Plan is built upon the principles and concepts of the EPA's policy for implementation of the government-wide National Incident Management System (NIMS).

Crisis Communication Plan

The Crisis Communication Plan can be activated for any incident by the Associate Administrator for the Office of Public Affairs (OPA), a Regional Administrator (RA) or by the EPA's National Incident Coordinator (NIC), the Director of Office of Emergency Management (OEM).

The Crisis Communication Plan will always be activated and deployed under the following two scenarios: 1) if EPA caused or is directly involved in the release or incident; or 2) the release or incident involves multiple regions.

Additional situations when the Plan may also be activated include, but are not limited to the following:

- The incident will exceed the response resources of the region.
- The incident will attract national, perhaps international, sustained political and/or media attention.
- Simultaneous incidents occur in different regions, triggering the need for resource prioritization.
- The incident is the result of a terrorist act, for which the EPA may serve as a response partner under the National Strategy for Homeland Security.

The EPA will retain full responsibility for its crisis communication programs and policies related to its activities. The Agency will implement an organized, integrated, and coordinated response to ensure the delivery of understandable, timely, accurate, and consistent information to the public during an incident response.

The EPA will provide the public with the widest practical and appropriate dissemination of information concerning its activities. The EPA will work with federal, state, local, tribal, trust territory, and other unified command partners to coordinate on development and release of all materials, including analytical data, digital content and press releases.

The EPA will contribute to the overall unified message of the response and support external affairs activities based on the Emergency Support Function-15 (ESF-15) Annex of the NRF, including providing staff and other support to the Joint Information Center (JIC), if requested.

This Plan was developed to facilitate national consistency in the review, approval and release of EPA information during an incident, while allowing for flexibility to meet regional needs. Its success requires the collaboration of response and public affairs personnel, as response tactics and communication objectives are interrelated and drive each other throughout a response. The Plan draws from best practices to establish key review and approval parameters, as well as roles and structures that organize information management during a response.

Crisis Communication Plan – Key Objectives

When this Plan is put into effect, the EPA will:

- Ensure that messages are conveyed to the public quickly, accurately and consistently by working with the media and sharing information externally;
- Work with partner agencies at the federal, state, local, and tribal levels, as well as private sector and non-governmental organizations when appropriate, on development of public health and environmental information;
- Convene the EPA’s Leadership Cadre to coordinate agency-wide communication objectives, as needed;
- Develop the strategy for product distribution, including Agency-specific products and joint products developed under ESF-15;
- Develop and disseminate an incident-specific “review, approve, release” process for communications materials;
- Oversee information verification and coordination of all materials for release;
- Review and approve messages in coordination with the Leadership Cadre;
- Review and approve Agency’s public response products such as press releases, fact sheets, remarks, digital text, social media content, and flyers that come from already-approved content;
- Coordinate with the public affairs official for the lead federal agency conducting the investigation of any incident-specific information, particularly terrorism-related information, or information related to criminal investigations into the cause of the incident;
- Ensure that all information dissemination is coordinated with the Department of Homeland Security JIC as described under ESF-15 as required by the event;
- Develop and maintain resources to assist public affairs personnel in their designated roles;
- Coordinate with Emergency Operations Center (EOC) Environmental Unit, program communication offices, and the Field Public Information Officer (PIO) on development and approval of products related to data.
- Compliment and support EPA’s other emergency response Orders 2070, 2071, 2072, and 2073.

Organizational Roles and Responsibilities

Leadership Cadre

EPA’s Leadership Cadre includes the following positions:

Associate Administrator for the Office of Public Affairs
Assistant Administrator for the Office of Land and Emergency Management
Associate Administrator for the Office of Congressional and Intergovernmental Relations
Regional Administrator(s) in the impacted area(s)
Senior Liaison for Crisis and Public Affairs Coordination
Regional Public Affairs Director(s) (PADs) in the impacted area(s)
National Incident Coordinator (NIC)
Regional Superfund Division Director
Regional Incident Coordinator (RIC)

Headquarters Emergency Operations Center Public Information Officer (EOC PIO)
Headquarters Emergency Operations Center Manager
Incident Commander
Field/Incident Command Public Information Officer (PIO)
EPA's ESF-15 representative to Department of Homeland Security (if named)

The Leadership Cadre is responsible for ensuring the coordination of communication between field, regional, national, and HQ-level incident management structures. The Leadership Cadre ensures that all communication with the public is understandable, timely, accurate, and consistent. The Cadre, or a subset, can convene in accordance with the needs of the incident response.

The Leadership Cadre is distinct from the Policy Coordinating Council (PCC) chaired by the EPA's Administrator but will work with and take direction from the PCC. The EPA's Leadership Cadre will execute its communication roles and responsibilities in accordance with this Plan.

Associate Administrator of the Office of Public Affairs

The AA OPA represents and advises the Administrator on all public information matters related to the management of the incident response and serves as the focal point for crisis communications policy issues. The AA OPA has ultimate decision making authority for public information matters on behalf of the Administrator.

The AA OPA will:

- Serve on the Policy Coordinating Committee (PCC). The PCC is convened during a nationally significant incident by the Administrator to exchange information about the incident and address significant Agency and inter-agency policy issues;
- Serve as the Administrator's representative to the White House and other Cabinet-level public affairs officials;
- Serve as the Administrator's representative to regional PADs and PIOs at all levels of the response;
- Serve on and coordinate with the Leadership Cadre throughout the incident;
- Establish an incident-specific process to be used for the public release of EPA information pertaining to the incident. This process is referred to throughout the Plan as the "review, approve, release" process;
- Coordinate the development of EPA's public messages;
- Approve communication products, including press releases, talking points, digital content and internal EPA employee communications;
- Designate a representative to act as EPA's ESF-15 representative to DHS;
- Designate a qualified OPA representative to be a member of the National Incident Coordination Team (NICT);
- Coordinate with OEM to designate qualified PIOs to work in the EOC;
- Coordinate with the PAD, Field PIO and National Incident Coordinator to designate spokespeople for media inquiries;
- Coordinate with other involved federal agency public affairs offices.

Assistant Administrator for the Office of Land and Emergency Management

The AA OLEM oversees the NIC and ensures the effectiveness of the response to meet Agency

objectives.

The AA OLEM will:

- Serve on and coordinate with the Leadership Cadre throughout the incident;
- Fulfill duties and roles as outlined in EPA Order 2071.

Associate Administrator for the Office of Congressional and Intergovernmental Relations

The AA for OCIR will:

- Serve on and coordinate with the Leadership Cadre throughout the incident;
- Provide information on interest and requests from elected officials;
- Provide official responses on behalf of the Administrator to elected official inquiries;
- Coordinate with the Incident Command on the ground for official visits by elected officials;
- Coordinate with other involved federal agency congressional/intergovernmental offices.

Regional Administrator

The RA provides the strategic vision for the scope of EPA involvement in the response by setting overall management objectives and priorities.

The RA will:

- Serve on the Leadership Cadre or delegate responsibility to the PAD;
- Act as regional spokesperson;
- Fulfill duties and roles as outlined in EPA Order 2071.

Senior Liaison for Crisis and Public Affairs Coordination (Senior Liaison)

The Senior Liaison represents and advises the AA OPA on all public information matters relating to management of the incident. The Senior Liaison also serves as the Headquarters lead for day-to-day crisis communication issues, including coordination with regions and serving as the EPA ESF-15 Representative to DHS.

The Senior Liaison will:

- Provide support and counsel to the AA OPA on public affairs matters;
- Serve on the Leadership Cadre or delegate responsibility within OPA;
- Oversee the “review, approve, release” process during the incident. This process may be modified throughout the incident as necessary.

Headquarters Emergency Operations Center: National Incident Coordinator and Public Information Officer

The EOC will serve as the primary contact point for information coming into the Agency and will disseminate information to appropriate parties. It will also serve as the official channel for the flow of all internal and external information between the regions and Headquarters. The NIC and the EOC PIO are part of the Leadership Cadre. The Director of OEM will typically serve as the NIC for the incident, and the EOC PIO is appointed by the AA OPA in consultation with

OEM.

The NIC will:

- Serve on the Leadership Cadre
- Fulfill duties and roles as outlined in EPA Order 2071;
- Ensure that www.epaossc.org guidelines are followed.

The EOC PIO will:

- Coordinate with the NIC in the EOC and other staff, such as the Liaison Officer;
- Serve as primary coordination point in the EOC for OPA leadership. Coordinates all materials for release from Field PIO to the AA OPA and works with the Office of General Counsel, represented by an attorney assigned to the EOC, to review materials;
- Coordinate with the EOC Environmental Unit regarding data and their release including the preparation of summaries of environmental sampling results, advisories, and statements on environmental data and related topics, coordinating with and seeking input from the Field PIO and the PAD;
- Ensure that materials are written in language easily understood by the general public;
- Coordinate approval and release of data-related materials using the established “review, approve, release” process (See the Environmental Data section in the Key Communication Considerations section of this plan for a description of EPA’s Playbook for Data Personnel, which describes the core function for data management personnel including the development of data communication and messaging.); and
- Coordinate with the Regional PIO and PAD to address media inquiries that require the expertise of Headquarter personnel to answer.

Regional Superfund Division Director

The Regional Superfund Division Director, or other Division Director assigned by the RA, may serve as EPA’s Senior Official at the DHS Joint Field Office (JFO). See EPA Order 2017 for more details.

The Superfund DD will:

- Serve on the Leadership Cadre;
- Fulfill duties and roles as outlined in EPA Order 2071;
- Ensure that www.epaossc.org guidelines are followed.

Regional Emergency Operations Center: Regional Incident Coordinator/REOC Manager REOC PIO

The REOC supports and coordinates the Agency’s tactical response in the field. It provides immediate reach-back support to the field Incident Management Team (IMT), and is the official channel for information flow and deployment of resources in the region. The PAD appoints the REOC PIO, who serves as the crisis communication liaison to the REOC. See EPA Order 2071 for more details.

The RIC is the primary point of contact with the IC and provides the IC with the management and

strategic objectives for the incident, as well as ensuring effective and timely communication between the field and senior management involving the RICT and the NICT to assure that policy issues are elevated and resolved. See EPA Order 2071 for more details.

The REOC Manager/RIC will:

- Fulfill duties and roles as outlined in EPA Order 2071.

The REOC PIO will:

- Coordinate with the REOC Manager, the REOC, the HQ EOC PIO, and HQ Environmental Units on data and its release using the established “review, approve, release” process;
- Works in close coordination with the Regional PAD and supports the field PIO.

Regional Public Affairs Director

The PAD advises and carries out the direction of the RA on all public information matters relating to the management of the incident. In close coordination with the AA OPA, the PAD serves as the crisis communication lead for the affected region(s).

The PAD will:

- Serve on the Leadership Cadre;
- Develop for the AA OPA’s approval, in coordination with the RA and the Incident Management Team PIO, all communication strategies and messages for the incident;
- Ensure products developed at the regional level go through the “review, approve, release” process and keeps the RA, the RICT and Regional Counsel apprised of the status of products being processed;
- Coordinate the release of information in response to requests from HQ, affected states, tribes, territories, local public officials and the public;
- Ensure that www.epaosc.org guidelines are followed in standing up and transitioning to the incident response public facing website, including coordination with the AA OPA on assessing the need for, transition to, and management of a national incident response website on www.epa.gov. The PAD develops incident specific procedures to review and post information on the website, including plans to sustain the website in order to meet the public communication needs for the duration of the response. In some cases, EPA’s Office of Public Affairs may manage the Agency’s public epa.gov website during an incident;
- Provide public affairs resources to the Field PIO as needed;
- Work with the Incident Commander and Field PIO to assess the need for additional communications resource support for the response. The Public Information Assistance Team (PIAT) and National Incident Management Assistance Team (National IMAT) are two mechanisms available to provide support during an incident response. In addition, if assistance is needed from other regions during responses that exhaust regional office resources, additional resources will first be requested by regions from their backup region(s), as defined on existing backup region Memoranda of Agreement (MOA), before pursuing resources from other regions. Requests and coordination will be made through the REOCs;
- Recommend to the RA, in consultation with the AA OPA, who should serve as the Field PIO during various stages of the incident. If the PAD and the AA OPA determine that

the PAD will serve as the Field PIO, the PAD will designate a PIO in the Region to coordinate from the regional office, including requesting public affairs support from another region. Subsequent rotations of individuals serving as Field PIO will typically be other PADs or other EPA public affairs staff with appropriate training and experience;

- Keep the AA OPA fully informed of public and media inquiries.

Incident Commander

The IC will:

- Serve on the Leadership Cadre
- Fulfill duties and roles as outlined in EPA Order 2071;
- Ensure that www.epaossc.org guidelines are followed;

The IC and Field PIO should refer to EPA's Incident Management Handbook for a full explanation of their responsibilities under ICS.

Incident Command (Field) Public Information Officer

The Field PIO represents and advises the Incident Commander (IC) on all public information matters related to the management of the incident. The PAD will appoint the Field PIO in consultation with the AA OPA. The Field PIO provides operational support to the IC and coordinates with the Leadership Cadre. The Field PIO handles media and public inquiries, emergency public information and warnings, rumor monitoring and response, media monitoring, and disseminates accurate, concise and timely information related to the incident, particularly regarding information on public health and protection. The Field PIO is also responsible for coordinating public information at or near the incident site and serving as the on-scene link to the JIC. Field PIOs should refer to EPA's Incident Management Handbook for a full explanation of their responsibilities under ICS.

The Field PIO will:

- Serve on the Leadership Cadre and act as the IC's representative to public affairs personnel staffing the JIC, if one is established;
- Attend Command and General Staff meetings and Planning meetings and coordinate public information activities with Command and General staff;
- Brief the IC or designated field personnel to ensure the accurate release of information to the public and media;
- Apprise the Leadership Cadre of any forthcoming announcements or major developments;
- Provide the EPA JIC Assistant PIO(s) with current information about EPA response activities and assist in review/approval of information requests;
- Working in coordination with the Leadership Cadre and public affairs personnel at the JIC, develop communication products such as risk communication templates, press releases and flyers for the IC's approval and distribution;
- Ensure products developed at the field level go through the "review, approve, release" process and coordinate the process with the IC;
- Keep the PAD updated on the need for resources to support public affairs activities and assign assistant PIOs as necessary (through the EOC resource request systems). In addition to backup region support, the PIAT and National IMAT are two other mechanisms

- available to provide support during an incident response;
- Ensure that www.epaossc.org guidelines are followed;
- Coordinate as needed with the PIAT and the National IMAT PIO if deployed;
- Advise the PAD of emerging issues and provide guidance to address these issues;
- Provide a communication summary at the end of each day to the Leadership Cadre on the activities for that day and on expected activities for the next day;
- Ensure all public affairs materials are archived and documented;
- Ensure early and meaningful community engagement with affected stakeholder in the incident response;
- Assess community needs, including vulnerable population needs, language barriers and other significant community factors that may affect incident response communications.

EPA ESF-15 Representative to DHS (if named)

The ESF-15 Representative to DHS will serve as the EPA liaison to the National JIC or the Joint Field Office (JFO) and will work to ensure that the EPA's public information and messaging is accurately and appropriately integrated into the overall national information coordination effort.

The ESF-15 Representative will:

- Be appointed by the AA OPA and serve on the Leadership Cadre.
- Serve in a leadership role on behalf of the EPA in all National Incident Communications Conference Line (NICCL) calls during the response. DHS operates these calls, which are designated as executive calls. They are held at least once a day during an incident to exchange and transmit up-to-date information between federal and affected state, local and tribal authorities);
- Provide situational awareness to the Leadership Cadre of all public information efforts related to the overall response at the National Level and ESF-15 (i.e., the JIC, NICCL calls, and joint media events, etc.).

National Incident Management Assistance Team

The National Incident Management Assistance Team (National IMAT) is available to provide support during an incident response. The National IMAT will function as described in EPA Order 2070. When the National IMAT is involved in a response, the Field PIO, as the lead PIO, is supported by the National IMAT PIO and the PIAT, if deployed.

Public Information Assistance Team

The EPA's Public Information Assistance Team (PIAT) will develop a communication module to provide a standardized mechanism to organize, integrate, and coordinate EPA information to ensure timely, accurate, accessible and consistent information. In accordance with the PIAT Concept of Operations Plan, the PIAT will be deployed to support the Field PIO in establishing a communication framework to support the communication objectives during a federal response to an incident.

Key Communication Considerations

The Crisis Communication Plan identifies several key communication considerations that are to be

specifically addressed by EPA PIOs during an incident. They are:

Community Engagement

The EPA has a longstanding commitment to active community engagement during a response. The EPA's Community Involvement Coordinators are highly experienced in determining what environmental messages are important to the public and if key messages are being disseminated to the public in an understandable, timely, accurate and consistent manner. CICs should coordinate with the Field PIO to determine content and delivery of key response messages.

Commitment to Language Access Obligations under Executive Order 13166

For every response, the EPA will assess limited English proficient (LEP) populations and needs. EPA will provide multi-lingual information that is understandable, timely, accurate and consistent to the public during an incident, where needed.

Environmental Justice

The EPA will develop information which addresses environmental justice factors as prescribed by EPA Memorandum, "Incorporating Environmental Justice Considerations into EPA Disaster Preparedness and Response Procedures," November 2, 2006.

Environmental Data

Environmental data is defined as scientific sampling and monitoring data related to the incident, which includes but is not limited to soil, sediment, air and water. In a response, environmental data must be disseminated to the public in an understandable, timely, accurate and consistent manner. The EPA's *Playbook for Data Personnel* describes the core functions for data management personnel including the development of data communication and messaging.

EPA Authority

The EPA will retain full responsibility for its crisis communication programs and policies related to its activities. The EPA will implement an organized, integrated, and coordinated response to ensure the delivery of understandable, timely, accurate, and consistent information to the public during an incident.

Coordinating of Public Information with EPA's Partners

State and Tribal Agency and Trust Territory Coordination

The EPA will coordinate the release of data and information with the affected states, tribes, local governments and trust territories. EPA will work with the state, tribal, local and trust territory agencies to develop the incident-specific process for release of state data and information. EPA will follow regional and area contingency plans for notification protocols to inform the potentially impacted stakeholders of an incident.

Interagency Coordination with DHS under ESF-15 – External Affairs Annex

The EPA will contribute to the overall unified message of the response and support external affairs activities based on the ESF-15 Annex of the NRF, including providing staff and other support to the JIC, if requested. The EPA will retain full responsibility for its crisis communication programs and policies related to its activities.

Training for Crisis Communications

The EPA will develop and maintain courses to support this Plan pursuant to EPA Order 2073, EPA Incident Command System Training, Qualifications and Certification Standards.

Employees must complete prerequisite course work before they can provide public affairs support to response operations.

Applicability

This Plan applies to all EPA offices, programs and facilities, with the exception of the Office of the Inspector General, and to all EPA PIOs serving in incident management structures including Incident Command Posts, Joint Field Offices, Regional Emergency Operations Centers and Headquarters Emergency Operations Center.

Plan Review

This Plan is effective immediately and will remain in effect until revised or rescinded based on after-action findings from future response actions. As necessary, the Office of Public Affairs and the Office of Emergency Management will convene a group made up of representatives of Removal Managers and Public Affairs Directors to revise the Plan. OPA and OEM will seek review from each region prior to modifying the plan.

Acronyms

AA(s) – Assistant/Associate Administrator(s)
AA OPA – Associate Administrator for the Office of Public Affairs
AA OCIR – Associate Administrator for Office of Congressional and Intergovernmental Relations
DHS – Department of Homeland Security
EPA – Environmental Protection Agency
ESF – Emergency Support Function
EOC – Headquarters Emergency Operations Center
EOC PIO – Headquarters Emergency Operations Center Public Information Officer
IC – Incident Commander
ICP – Incident Command Post
Field PIO – Incident Command Public Information Officer
IMT – Incident Management Team
IMT PIO – Incident Management Team Public Information Officer
JIC – Joint Information Center
NAR – National Approach to Response
NCP – National Contingency Plan
NIC - National Incident Coordinator
NICCL – National Incident Communications Conference Line
NICT – National Incident Coordination Team
NIMS – National Incident Management System
NRF - National Response Framework
OCIR – Office of Congressional and Intergovernmental Affairs
OEI – Office of Environmental Information
OEM – Office of Emergency Management
OGC – Office of General Counsel
OPA – Office of Public Affairs
ORD – Office of Research and Development
PAD – Public Affairs Director
PCC – Policy Coordinating Committee
PIO(s) – Public Information Officer(s)
REOC – Regional Emergency Operations Center
REOC PIO – Regional Emergency Operations Center Public Information Officer
RA(s) – Regional Administrator(s)