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Crisis Communication 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 U.S. Environmental Protection Agency has yet to encounter. A crisis communication 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. 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 nimbler 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 state, local, 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 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 agency's process for communicating environmental information to the public and coordinating public information among the agency's field operations, regional offices and headquarters during a response. It establishes roles and responsibilities to effectively integrate the agency's public affairs, emergency management and interagency communication 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 EPA Order 2071 (National Approach to Response) and supports the agency's efforts under the National Response Framework when it is designated as a lead or support agency. The plan is built upon the principles and concepts of the agency's policy for implementation of the government wide National Incident Management System.

Applicability

This plan applies to all agency offices, programs and facilities, with the exception of the Office of the Inspector General, and to all agency Public Information Officers serving in incident management structures including Incident Command Posts, Joint Field Offices, Regional Emergency Operations Centers and the headquarters Emergency Operations Center.

Authorities

Internal agency authorities that are related to the implementation of the plan include:

- EPA Order 2070, (EPA's Incident Management Teams and National Incident Management Assistance Team);
- EPA Order 2071, (National Approach to Response);
- EPA Order 2072, (Response Support Corps); and
- EPA Order 2073, (EPA Incident Command System Training, Qualifications and Certification Standards).

Crisis Communication Plan

The Crisis Communication Plan can be activated for any incident by the associate administrator for the Office of Public Affairs, a regional administrator, the agency's national incident coordinator or by the director of the Office of Emergency Management.

The Crisis Communication Plan will always be activated and deployed under the following two scenarios: 1) if the agency 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; and
- The incident is the result of a terrorist act, for which the agency may serve as a response partner under the NRF.

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

Through this Plan, the Agency intends to assist the On-Scene Coordinator in communicating with affected parties and the public during incidents, consistent with the National Contingency Plan. The agency will contribute to the overall unified message of the response and support external affairs activities based on the Emergency Support Function-15 Annex of the NRF, including providing staff and other support to the Joint Information Center, if requested.

This plan was developed to facilitate national consistency in the review, approval and release of agency 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 agency 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 agency’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;
- Keep the National Security Council and the larger interagency community informed;
- Develop and maintain resources to assist public affairs personnel in their designated roles;
- Coordinate with EOC Environmental Unit, program communication offices, and the field/Incident Command Public Information Officer (field PIO) on development and approval of products related to data; and
- Complement and support EPA emergency response Orders 2070, 2071, 2072 and 2073.

Organizational Roles and Responsibilities

Leadership Cadre

The agency'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;
- Associate administrator for the Office of Homeland Security;
- Regional administrator(s) in the impacted area(s);
- Senior advisor for emergency response communications
- Regional public affairs director(s) in the impacted area(s);
- National incident coordinator;
- Regional superfund division director;
- Regional incident coordinator;
- Headquarters Emergency Operations Center Public Information Officer;
- HQ Emergency Operations Center manager;
- Incident Commander;
- Field/Incident Command Public Information Officer; and
- ESF-15 representative to the 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 Committee chaired by the Administrator but will work with and take direction from the PCC. The 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 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 agency information pertaining to the incident. This process is referred to throughout the plan as the “review, approve, release” process;
- Ensure that www.epaosc.org guidelines are followed;
- Coordinate the development of agency public messages;
- Approve communication products, including press releases, talking points, digital content and internal agency employee communications;
- Designate a representative to act as the agency’s ESF-15 representative to DHS;
- Designate a qualified OPA representative to be a member of the National Incident Coordination Team;
- Coordinate with OEM to designate qualified PIOs to work in the EOC;
- Coordinate with the PAD, field PIO and NIC to designate spokespeople for media inquiries; and
- 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; and
- 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 commander on the ground for official visits by elected officials; and
- Coordinate with other involved federal agency congressional/ intergovernmental offices.

Associate Administrator for the Office of Homeland Security

The AA for OHS will:

- Serve on and coordinate with the Leadership Cadre throughout the incident;
- Inform the National Security Council and, in consultation with AA OLEM, AA OCIR, AA OPA and others, facilitate interagency coordination regarding the incident;
- Assist the Administrator if it is appropriate to convene a PCC to address

significant intra-agency and inter-agency national policy issues, consistent with EPA Order 2071; and

- Monitor intelligence streams for information relevant to the incident and the Leadership Cadre.

Regional Administrator

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

The RA will:

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

Senior Advisor for Emergency Response Communications

The senior advisor represents and advises the AA OPA on all public information matters relating to management of the incident. The senior advisor also serves as the HQ lead for day-to-day crisis communication issues, including coordination with regions and serving as the agency ESF-15 representative to DHS.

The senior advisor will:

- Provide support and counsel to the AA OPA on public affairs matters;
- Serve on the Leadership Cadre or delegate responsibility within OPA; and
- 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 HQ. 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; and
- Ensure that www.epaosc.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. Coordinate all materials for release from field PIO to the AA OPA and work 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 the agency’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 field PIO and PAD to address media inquiries that require the expertise of headquarters personnel to answer.

Regional Superfund Division Director

The regional superfund division director, or other DD assigned by the RA, may serve as the agency’s senior official at the DHS JFO. See EPA Order 2071 for more details.

The superfund DD will:

- Serve on the Leadership Cadre;
- Fulfill duties and roles as outlined in EPA Order 2071; and
- Ensure that www.epaos.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, 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 Regional Incident Coordination Team 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 EOC PIO and HQ

- Environmental Unit on data and its release using the established “review, approve, release” process; and
- Work 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 field 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.epaossc.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, the agency’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 IC and field PIO to assess the need for additional communications resource support for the response. The Public Information Assistance Team and National Incident Management Assistance Team 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, 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 agency 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; and
- Ensure that www.epaossc.org guidelines are followed.

The IC should refer to the agency's Incident Management Handbook for a full explanation of the position's responsibilities under the Incident Command System.

Field/Incident Command Public Information Officer

The field PIO serves on the Command Staff represents and advises the 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 the agency'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 agency JIC assistant PIO(s) with current information about agency 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 stakeholders in the incident response; and
 - 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 agency liaison to the JIC or JFO and will work to ensure that the agency'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 agency in all National Incident Communications Conference Line 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; and
- Provide situational awareness to the Leadership Cadre of all public information efforts related to the overall response at the national level and ESF-15 (e.g., the JIC, NICCL calls and joint media events).

Office of General Counsel and Freedom of Information Act Coordination

The Leadership Cadre will coordinate with the Office of General Counsel, as necessary, to ensure that all non-public information (including classified information) is appropriately protected. When requests for information regarding an incident are submitted to the agency under the Freedom of Information Act, the FOIA Expert Assistance Team will consult with the Leadership Cadre for a coordinated response, ensuring that all applicable deadlines and required reviews are adhered to in responding to FOIA requests from the public and media.

National Incident Management Assistance Team

The 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 will continue to be the lead PIO, as supported by the National IMAT PIO and the PIAT, if deployed.

Public Information Assistance Team

The agency's PIAT will develop a communication module to provide a standardized mechanism to organize, integrate and coordinate agency 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 agency PIOs during an incident.

Community Engagement

The agency has a longstanding commitment to active community engagement during a response. The agency'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 agency will assess limited English proficient populations and needs. The agency will provide multi-lingual information that is understandable, timely, accurate and consistent to the public during an incident, where needed.

Environmental Justice

The agency will develop information which addresses environmental justice factors as prescribed by agency 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 agency's Playbook for Data Personnel describes the core functions for data management and communications personnel including the development of data communication and messaging.

EPA Authority

The agency 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.

Coordinating Public Information with Agency's Partners

State and Tribal Agency and Trust Territory Coordination

The agency will coordinate the release of data and information with the affected states, tribes, local governments and trust territories. The agency will work with the state, tribal, local governments and trust territory agencies to develop the incident-specific process for release of state data and information. The agency 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 agency 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 agency will retain full responsibility for its crisis communication programs and policies related to its activities.

Training for Crisis Communications

The agency will develop and maintain courses to support this plan pursuant to EPA Order 2073. Employees must complete prerequisite course work before they can provide public affairs support to response operations.

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, OPA and OEM will convene a group of representatives from the regional 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 OLEM – Assistant Administrator for the Office of Land and Emergency Management
AA OPA – Associate Administrator for the Office of Public Affairs
AA OCIR – Associate Administrator for Office of Congressional and Intergovernmental Relations
AA OHS – Associate Administrator for the Office of Homeland Security
CIC – Community Involvement Coordinator(s)
DD – Division Director
DHS – Department of Homeland Security
EPA – Environmental Protection Agency
ESF-15 – Emergency Support Function-15
EOC – Headquarters Emergency Operations Center
EOC PIO – Headquarters Emergency Operations Center Public Information Officer
FOIA – Freedom of Information Act
HQ – Headquarters
IC – Incident Commander
ICS – Incident Command System
Field PIO – Field/Incident Command Public Information Officer
JFO – Joint Field Office
JIC – Joint Information Center
National IMAT – National Incident Management Assistance Team
NIC - National Incident Coordinator
NICCL – National Incident Communications Conference Line
NICT – National Incident Coordination Team
NRF - National Response Framework
OCIR – Office of Congressional and Intergovernmental Affairs
OEM – Office of Emergency Management
OPA – Office of Public Affairs
PAD – Public Affairs Director
PCC – Policy Coordinating Committee
PIO(s) – Public Information Officer(s)
RA(s) – Regional Administrator(s)
REOC – Regional Emergency Operations Center
REOC PIO – Regional Emergency Operations Center Public Information Officer
RIC – Regional Incident Coordinator
RICT – Regional Incident Coordination Team