



Response Exercise Program Improvements Process Exercise Guidance Workshop

April 18, 2017

Alaska Pacific University

Agenda

1. Review Guiding Principles, Statutes and Regulations Related to Exercises
2. Review and Discuss Survey/Visioning Session Results and ADEC's Preliminary Decisions and Rationale on Key Topics
3. Next Steps for Program Development
4. HSEEP Fundamentals
5. HSEEP Exercise

Key Topics

- Program Purpose
- Guidance Document
- Homeland Security Exercise Evaluation Program (HSEEP)
- ADEC Roles
- National Preparedness for Response Exercise Program (PREP/NPREP)
- Unannounced Exercises
- Risk-based Approach
- PRAC drills
- Multi-year Schedule
- Lesson's Learned
- Exercise Credits

Guiding Principles for Response Exercise Improvement Process

- Verify compliance with statutes and regulations in regard to operators' ability to adequately respond to a spill.
- Maintain or improve current levels of response readiness.
- Encourage innovation and improvement.
- Maintain consistency statewide.

Guiding Principles for Response Exercise Improvement Process

- Strengthen and broaden oil spill response capability and coordination throughout the response community.
- Increase the value of response exercises for the entire response community.
- Increase cost effectiveness of response exercises for the department and industry.

Exercise Statutes & Regulations

State of Alaska Statutes and ADEC Regulations provide the foundation for ADEC's Response Exercise Program.

- ***Oil Discharge Prevention and Contingency Plan Exercises***
- Nontank Vessel Plan Exercises
- Statewide Response Readiness Exercises

Exercise Statutes & Regulations

Statutes for ODPCPs

“The department may require an applicant or holder of an approved contingency plan to take steps necessary to demonstrate the applicant’s or holder’s ability to carry out the contingency plan, including:

...response team exercises...

Exercise Statutes & Regulations

Regulatory tools for ODPCPs

- department may conduct... exercises to assure that a... contingency plan is adequate in content and execution.
- no more than two exercises will be required... in each 12 month period *unless...*
- department will... require additional exercises until it is satisfied that the plan and its execution are adequate...

Exercise Statutes & Regulations

ODPCPs - Another Option

A regular training exercise initiated by the plan holder may be considered a discharge exercise *if*:

- The department monitors, evaluates, or participates in the exercise, and
- Concurs that it is equivalent to a discharge exercise conducted by the department, and
- Plan holder notifies the department in advance and provides opportunity for a department representative to be present and participate

Exercise Statutes and Regulations

And what about Credit for Exercises in ADEC's statutes or regulations ?

Let's rephrase that:

- How do I know if my exercise counts as a .485 exercise?
- How do I know if I have to do another one? Or two? Or more?

Exercise Statutes & Regulations

Nontank Vessels (NTV)

Exercises are held for NTV Cleanup Contractors and/or NTV Incident Management Teams for the same purpose and frequency as other plan holders:

- Adequacy of content and execution
- Up to 2 for each registered contractor or IMT per year

Exercise Statutes & Regulations

Statewide Response Readiness

By statute, the department may work with many entities to conduct exercises for the specific purpose of identifying modifications to the Statewide Master Plan (The Unified Plan).

Exercise Statutes & Regulations

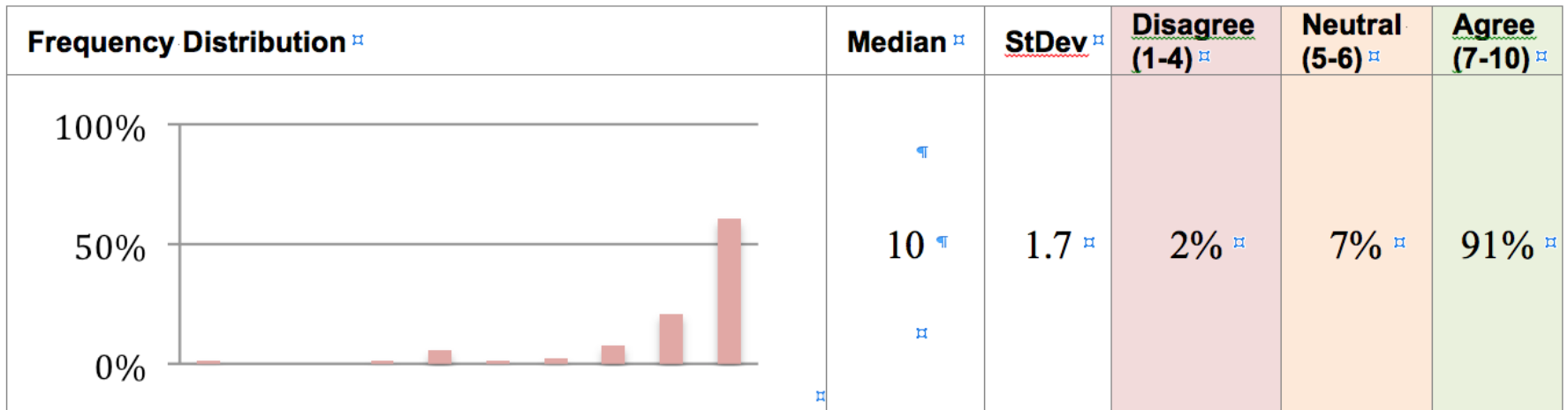
Questions
and
Discussion

Survey and Vision Session Results

- February 2016 Whitepaper
- October 2016 Survey
- December 2016 Visioning Sessions

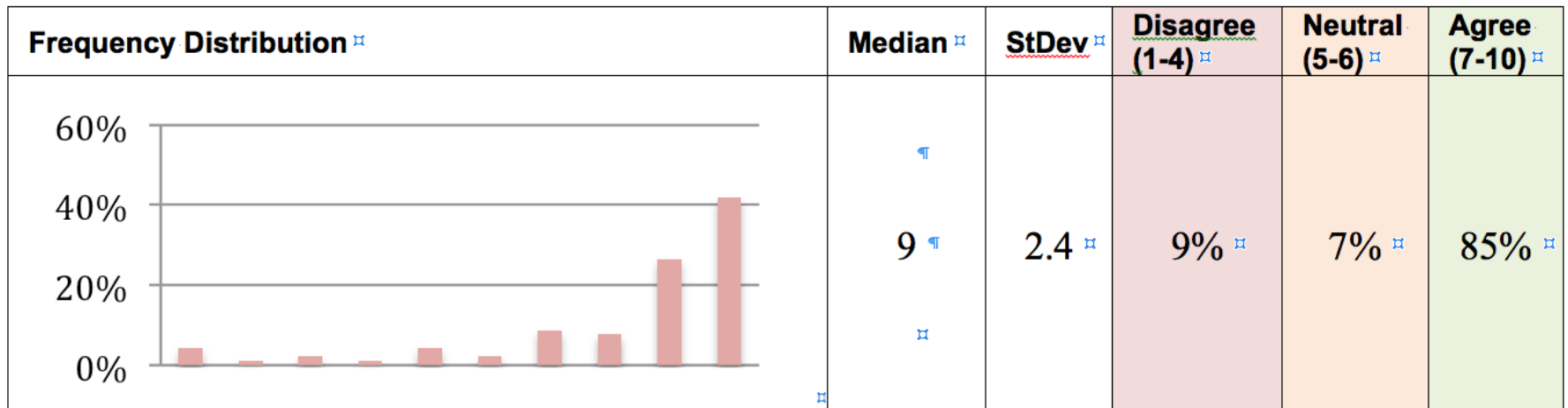
Survey and Vision Session Results

The purpose of a drill or exercise is to practice, learn, and develop partnerships in advance of an actual oil spill response.




Survey and Vision Session Results

The purpose of a drill or exercise is to test the response readiness of a response team.



Survey and Vision Session Results

Learning is not failure. An exercise that uncovers deficiencies can still be a success.

Frequency Distribution [⌘]	Median [⌘]	StDev [⌘]	Disagree (1-4) [⌘]	Neutral (5-6) [⌘]	Agree (7-10) [⌘]
 <p>A bar chart showing the frequency distribution of responses. The y-axis represents percentage from 0% to 100%. The x-axis represents response categories. The distribution is highly skewed towards the 'Agree' category, which accounts for 98% of the responses. The 'Disagree' category accounts for 0%, and the 'Neutral' category accounts for 2%.</p>	10 [⌘]	1.0 [⌘]	0% [⌘]	2% [⌘]	98% [⌘]

Survey and Vision Session Results

Cooperation/Communication:

- Develop partnerships and relationships.
- Build trust, team building
- Practice training opportunities, understand roles and requirements.
- Understand participant's roles, responsibilities, and limits.
- Involve stakeholders.
- Share teaching moments.
- Need face to face time with industry experts, regulators, and partners

Survey and Vision Session Results

What do we keep?

- Joint planning of exercises, relationships with plan reviewers
- NGO Participation
- Inter-agency and governmental cooperation
- In person participation of drills and exercises
- Provide senior, experienced state personnel to provide training, evaluation or participation in the exercise.
- Exercises:
 - Standard evaluation criteria
 - Focus on learning versus Pass/Fail.
 - Un-announced and spontaneous

Survey and Vision Session Results

What do we change?

- Include Alaska Native governments
- Share documents
- Allow for all participants in Mutual Aid drills (MAD) to have their participation recognized
- Establish joint exercise planning
- Adapt PREP and HSEEP to Alaska
- Improve guidance documents (planning, objectives, lessons learned)
- Improve scheduling
- Written evaluation of exercises

Survey and Vision Session Results

What do we change?

- More coordination between Federal/State/local agencies on planning drills
- Share lessons learned.
- Evaluation standards for the exercises process to improve consistency and objectivity.
- Establish clear goals and objectives for training exercises.
- Establish more realistic drills and exercises.
- Adopt project management principles according to the Project Management Institute (PMI) guide.

Survey and Vision Session Results

What do we eliminate?

- Focus on “Gotcha”.
- Unannounced Drills
- Repeated/redundancy of exercises
- Reduce/eliminate drills during extreme weather conditions.
- Shorten duration of drills/exercises.
- Mandate all involved parties to be present from beginning until end of exercises/training.

Survey and Vision Session Results

What do we eliminate?

- Temper the expectation of a completed Incident Action Plan (IAP) in one day.
- Lack of follow through from past drills/exercises; need to share lessons learned
- Adjust single day drills: too scripted, unrealistic, does not test what needs to be tested.

Survey and Vision Session Results

What does “value” in a response exercise mean to you?

- Develop knowledge and skills of responders.
- Establish same goals: insure everyone is working towards a common solution
- Identify areas for improvement and lessons learned.
- Continuous improvement
- Collaborate and build relationships.
- Provide training that has responders working through real life situations such as weather, broken equipment, and making adjustments to tactics as necessary.

Survey and Vision Session Results

What does “value” in a response exercise mean to you?

- Practice so everyone learns and prepares
- Improve decision making.
- Verify/validate that contingency plans are adequate in content and execution.
- Train before exercises, exercises should test training.

Survey and Vision Session Results

What can be done to improve the value of exercises?

- Collaborate; more agency interaction
- Plan out exercises; more variety in drills (integrate lessons learned).
- Adopt HSEEP and then adapt accordingly
- Define roles and responsibilities
- Improve scheduling
- All participants should be players
- Improve follow-up and reporting
- Establish measurable quantities for success



Preliminary Decisions and Rationale

- ADEC appreciates this input and fundamentally agrees with much of it.
- ADEC agrees that response exercises are important and necessary to maintain or improve levels of response readiness.
- We feel that the response exercise community is aligned with the Guiding Principles and we need to work together to develop a system congruent with them.

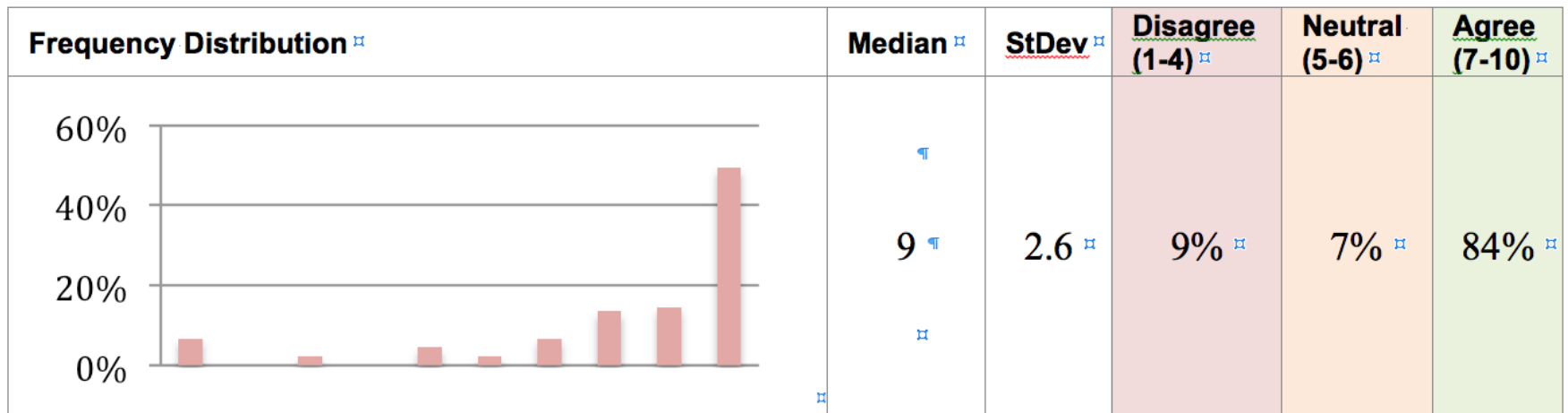


Preliminary Decisions and Rationale

- However, ADEC has the responsibility to verify operator's ability to adequately respond to a spill. We have to work within those responsibilities while embracing the added benefits of practicing response together.
- ADEC is not proposing new statutes or regulations at this time. We believe our existing regulatory framework provides great flexibility to adopt a variety of response exercise approaches while improving our program.

Survey and Vision Session Results

ADEC should develop a guidance document to assist operators in understanding the purpose, expectations, and requirements of the ADEC Response Exercise Program.



Survey and Vision Session Results

What elements should be included in a guidance document to the ADEC Response Exercise Program and why?

- Clear goals and expectations; expected deliverables
- Joint planning with all players
- Clear roles and responsibilities
- Why state requirements are different than federal/other requirements
- Competency requirements for ADEC personnel involved in exercises
- Capture, collaborate, and share on lessons learned.
- PREP/HSEEP
- Credits
- Process for developing an exercise schedule



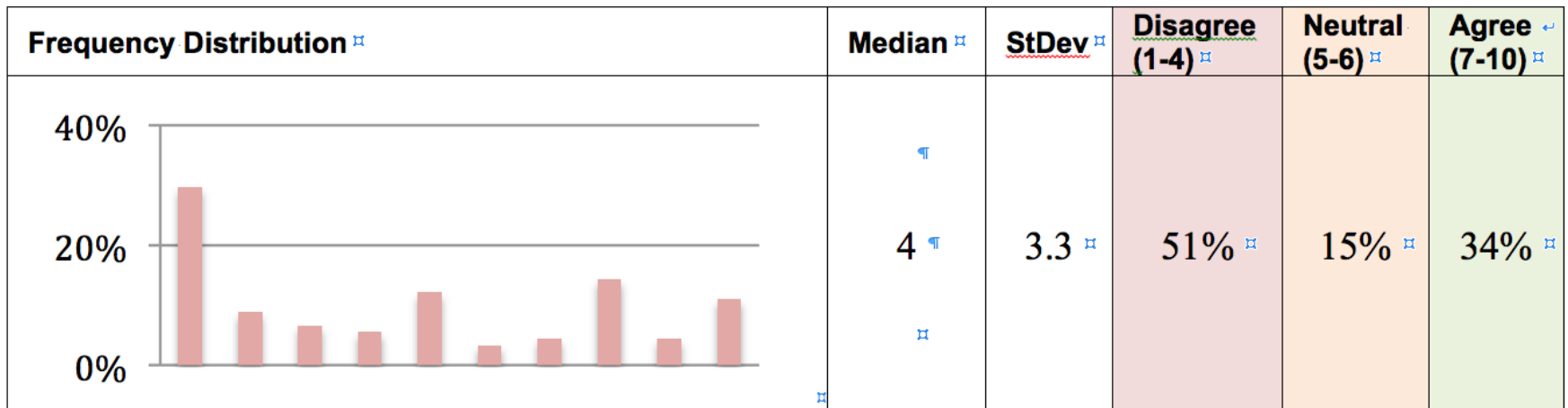
Preliminary Decisions and Rationale

ADEC is developing a Guidance Document

- Statutory and Regulatory Foundation
- ADEC/SOA Roles and Responsibilities
- Scheduling
- Exercise Planning Process Based on HSEEP
 - Design and Development
 - Conduct
 - Evaluation
 - Improvement Planning

Survey and Vision Session Results

Please rate your familiarity with Homeland Security Exercise Evaluation Program (HSEEP).



Survey and Vision Session Results

After seeing the HSEEP presentation, which components of HSEEP would be useful for ADEC to adopt?

- Use of HSEEP exercise cycle
- Implement objectives based methodologies.
- Need more information
- Collaboration, planning, process, evaluation
- Multi-year calendar approach
- Elements of HSEEP need to be scalable.
- Dovetail PREP and HSEEP.
- ADEC should provide HSEEP workshops.

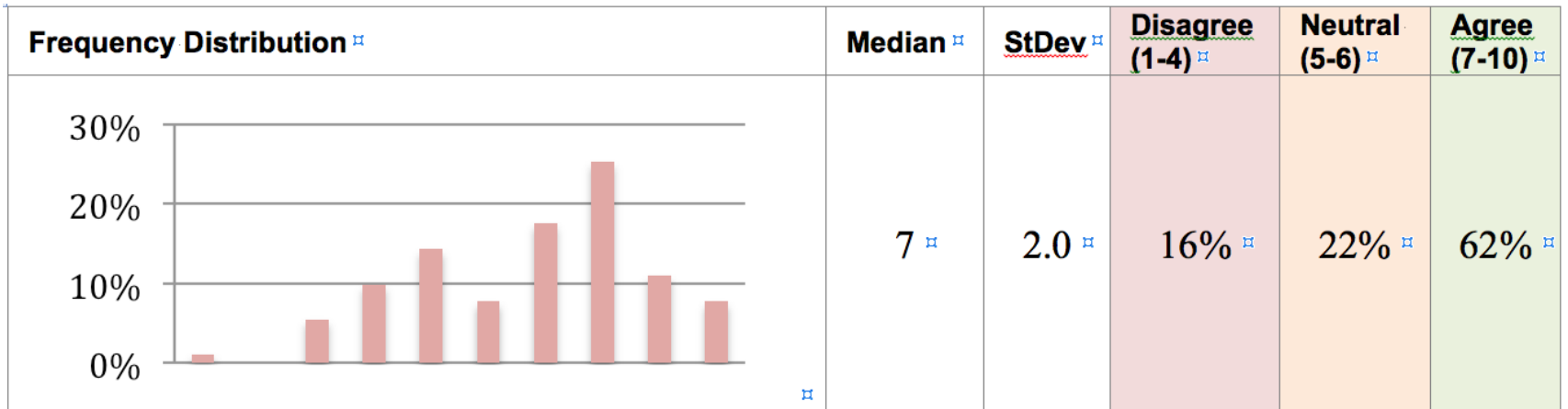


Preliminary Decisions and Rationale

- HSEEP – we will adopt HSEEP for ADEC and implement statewide.
- Why HSEEP?
 - Provides a common methodology for program management and planning.
 - Widely considered to be a best practice.
 - Scalable and flexible.
 - Alignment with other exercise programs. nationally and internationally.

Survey and Vision Session Results

The role of ADEC staff during exercises is clear and is helpful to our exercise experience.



Survey and Vision Session Results

How can ADEC staff make their role during exercises more clear?

- Take a stronger role in the exercise planning process.
- Roles, responsibilities and expectations for all participants should be made clear.
- Establish guidance/cooperation/collaboration with regulated community, sister agencies, federal partners.
- Provide guidance in roles and responsibilities.
- Don't mix participation and evaluation roles.
- Need thorough pre-planning meetings.
- Establish and communicate expectations of outcomes.
- Cannot be an evaluator and player
- Better training for ADEC personnel as responders



Preliminary Decisions and Rationale

- ADEC will conduct staff training using the Guidance Document to insure consistency.
- Augmentation - DEC/SOA role of exercise participant.



Preliminary Decisions and Rationale

- * The Alaska Unified Plan Defines Supplemental Augmentation:

“In addition to performing its oversight duties, the State may augment the efforts of the responsible party and/or Federal government. Supplemental assistance may take the form of technical advice and/or adding State cleanup resources to combat a spill. The timely containment and cleanup of large spills may require that the RP tap all available resources and expertise, including the State’s.”



Response Exercise Program Improvements Process Exercise Guidance Workshop

10 minute break

Survey and Vision Session Results

Is PREP sufficient for the State of Alaska to determine if a state approved Oil Discharge Prevention and Contingency plan is adequate in content and execution? Why or Why not?

In agreement with statement:

- Comprehensive
- Acceptance in other jurisdictions
- Provides clear guidance
- Definite schedule to follow (easy to understand)
- Provides consistency
- Scalable

Survey and Vision Session Results

Is PREP sufficient for the State of Alaska to determine if a state approved Oil Discharge Prevention and Contingency plan is adequate in content and execution? Why or Why not?

In disagreement with statement:

- PREP lacks level of adequate exercises.
- Too simple
- PREP is too difficult to understand.
- Does not meet State requirements
- State of Alaska requirements are more detailed and expect stronger response capabilities.



Preliminary Decisions and Rationale

- PREP– ADEC supports and encourages plan holders to incorporate their PREP goals and components into discharge exercises as much as possible to maximize efficiency for the plan holder and agencies.

Survey and Vision Session Results

Unannounced exercises are useful for testing response readiness and should be utilized more often.

Frequency Distribution [⌵]	Median [⌵]	StDev [⌵]	Disagree (1-4) [⌵]	Neutral (5-6) [⌵]	Agree (7-10) [⌵]																						
<table border="1"><caption>Frequency Distribution Data</caption><thead><tr><th>Category</th><th>Frequency (%)</th></tr></thead><tbody><tr><td>1</td><td>10</td></tr><tr><td>2</td><td>3</td></tr><tr><td>3</td><td>10</td></tr><tr><td>4</td><td>10</td></tr><tr><td>5</td><td>14</td></tr><tr><td>6</td><td>8</td></tr><tr><td>7</td><td>8</td></tr><tr><td>8</td><td>9</td></tr><tr><td>9</td><td>9</td></tr><tr><td>10</td><td>22</td></tr></tbody></table>	Category	Frequency (%)	1	10	2	3	3	10	4	10	5	14	6	8	7	8	8	9	9	9	10	22	6 [⌵]	3.0 [⌵]	32% [⌵]	21% [⌵]	47% [⌵]
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Survey and Vision Session Results

Unannounced exercises are useful for testing response readiness and should be utilized more often. If you disagree with this statement, why?

- Concern over impact on business operations
- Exercises and drills become activities for punishment rather than training to improve
- Limit frequency and usage
- Standardize them to focus on initial actions
- Insure these exercises don't threaten or hamper daily operations at a facility
- Unannounced drills do not test a company's ability to respond to a real incident



Preliminary Decisions and Rationale

- Unannounced Exercises –ADEC plans to use judiciously and for specific purposes.

Survey and Vision Session Results

A risk based approach should be used to determine exercise requirements.

Frequency Distribution [⌘]	Median [⌘]	StDev [⌘]	Disagree (1-4) [⌘]	Neutral (5-6) [⌘]	Agree (7-10) [⌘]
<p>A bar chart showing the frequency distribution of responses. The y-axis represents percentage from 0% to 30% in 10% increments. The x-axis represents seven categories. The bars are colored in a light red/pink hue. The distribution is as follows: Category 1: ~5%; Category 2: 20%; Category 3: ~8%; Category 4: ~18%; Category 5: ~15%; Category 6: ~16%; Category 7: 20%.</p>	8 [⌘]	2.2 [⌘]	7% [⌘]	25% [⌘]	68% [⌘]

Survey and Vision Session Results

What risk factors should be used to determine exercise requirements?

- Volume
- Product
- Sensitive areas
- Vessel traffic
- Navigation risk
- Toxicity
- Remoteness
- Number of responder's equipment
- Extreme weather
- Public land use
- Volume spilled
- Local land use/habitat

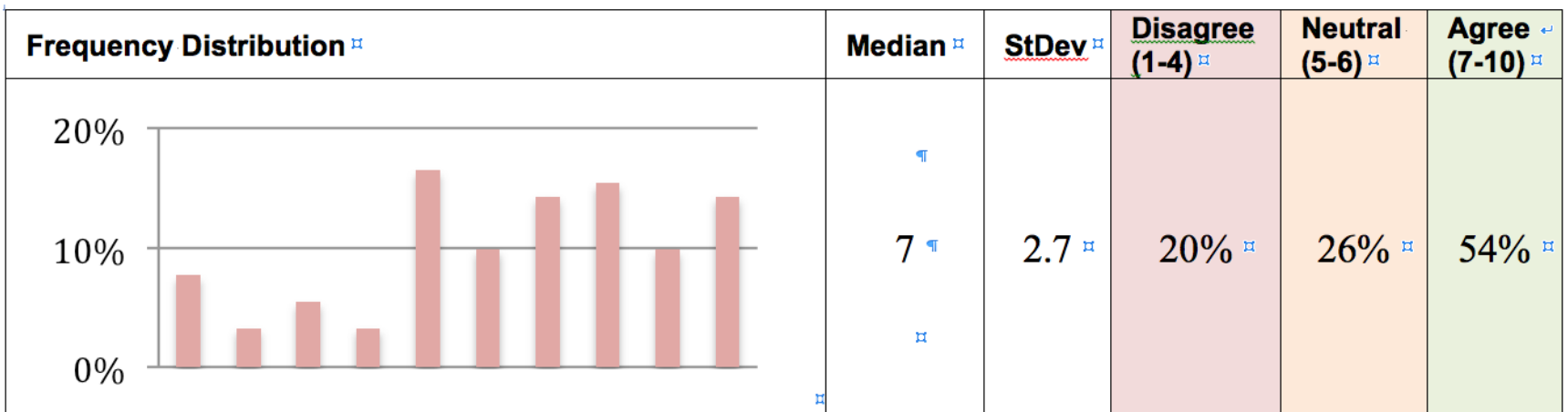


Preliminary Decisions and Rationale

- Risk Based Approach – Not at this time, but available for future consideration

Survey and Vision Session Results

A program should be developed to exercise Primary Response Action Contractors (PRACS), separately from Regulated Operators, for implementing response tactics. This would reduce the redundancy inherent in the current system.



Survey and Vision Session Results

How can PRACs be exercised to the benefit of multiple plan holders?

- MAD is a great way to exercise PRACs
- Certain regions of state are underserved
- Skills associated with working with a PRAC also need to be exercised by all plan holders
- Establish roles, responsibilities, and objectives
- Share costs/finances
- Have more PRAC personnel at drills
- Don't require PRACs to exercise the same tactic for multiple plan holders
- Need for PRACs to understand every plan holders operations/site/plan⁵⁰

Survey and Vision Session Results

A program should be developed to exercise PRACs, separately from Regulated Operators, for implementing response tactics. What would be the disadvantages of such a program?

- Concern over costs and administrative burden
- Loss of levels of preparedness
- Places more burden on PRACs and less on Responsible Parties (RP)
- Lack of internal coordination
- Blurring of lines between PRAC and Oil Spill Removal Organization (OSRO) requirements
- Require a regulation or statute change
- Difficult to achieve consensus among PRAC members
- Loss of opportunities to collaborate between PRAC's and plan holders

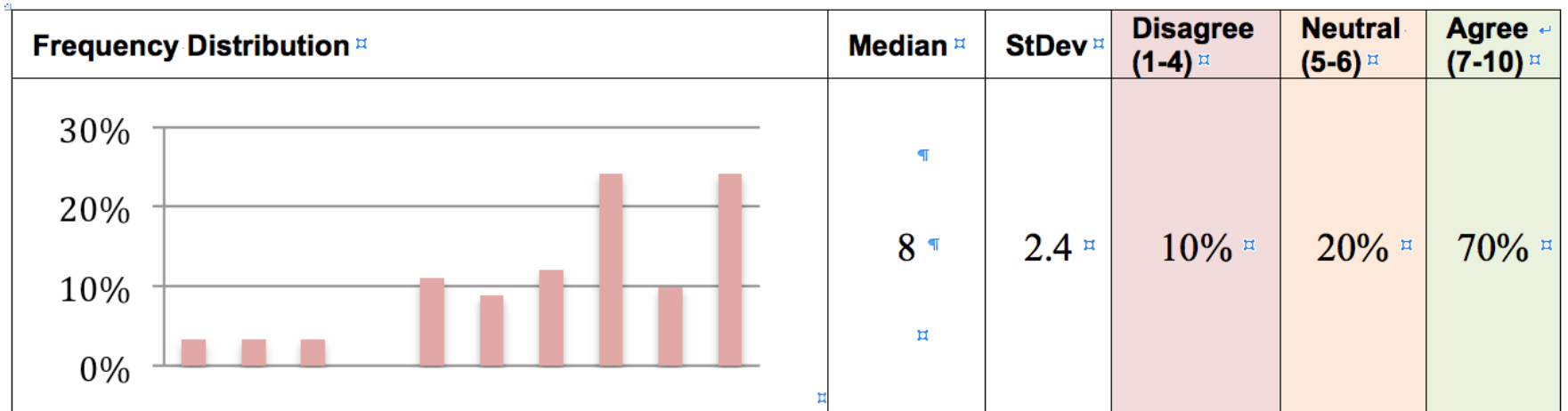


Preliminary Decisions and Rationale

- PRACs – continue to maintain direct relationship with plan holders and work with PRACS through them .
- ADEC supports coordinated multi-plan holder exercises with a single PRAC to demonstrate adequacy of common response strategies and tactics in a common operating area.

Survey and Vision Session Results

A multi-year exercise scheduling tool should be used to plan exercises.



Survey and Vision Session Results

A multi-year exercise scheduling tool should be used to plan exercises. If you disagree with this statement, why?

There was very little disagreement on this topic

- Remove redundancies
- Do not stack exercises together
- Need for flexibility when planning over a year out to account for severe weather

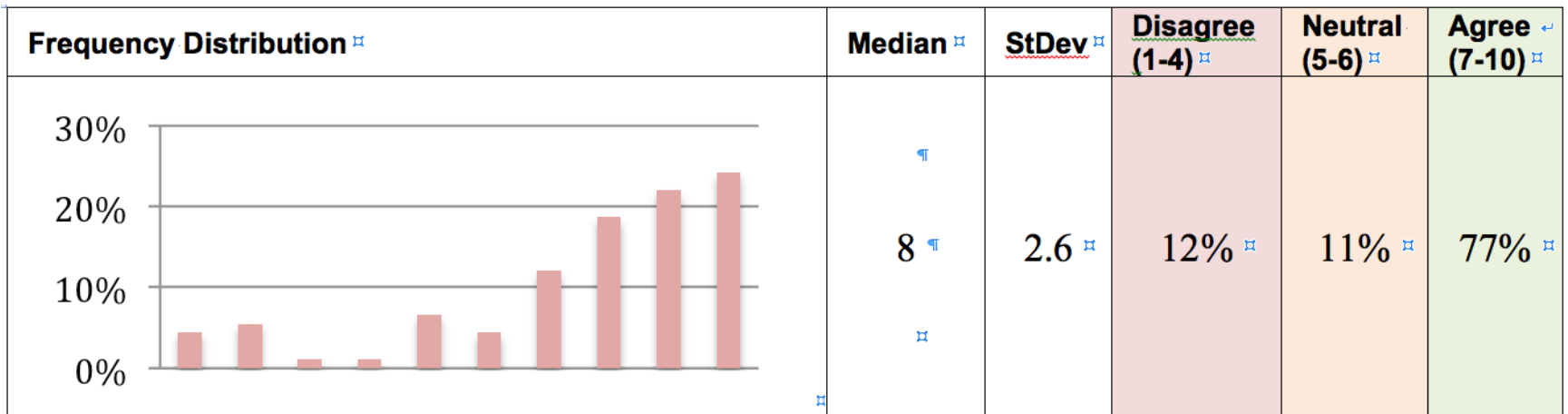


Preliminary Decisions and Rationale

- Multiyear Scheduling Tool – Yes. We need a scheduling tool that is accessible to agencies and plan holders. Exploring options.
- Scheduling is a high priority for ADEC.
- Scheduling is component of HSEEP.

Survey and Vision Session Results

An easily accessible statewide anonymous database of exercise lessons learned would be a useful tool.



Survey and Vision Session Results

If I had access to the lessons learned in other organizations exercises, I would use that information to _____.

- Compose training topics for my crews
- Identify trends
- Identify lessons learned that have not been encountered. Evaluate the probability of them occurring and design these into future exercises
- Improve training
- Strengthen exercise program
- Design exercises with objective not covered by others
- Identify my facilities potential failings
- Review other's solutions
- Demonstrate importance to legislators and government leaders

Survey and Vision Session Results

A lessons learned database would not be useful because _____.

Most comments stated that a lessons learned database would be useful.

- Concerns over administration and cost
- Definition of a lesson learned is not always equal. They are specific to a company or area of operation
- Could be misused by those designing to advance a particular point of view or issue



Preliminary Decisions and Rationale

- Lessons Learned Database – No database under development at this time. ADEC is capturing Annual Lessons Learned and compiling them to capture themes as an initial step.

Survey and Vision Session Results

How would an exercise credit mechanism be beneficial to you?

- Discussion about ‘what’ is a credit, it’s function, etc. Examples include:
 - Protection from “over drilling” or conducting too many exercises
 - An actual response would offsets the need to conduct an exercise
 - Acknowledge that PREP requirements were met for an ADEC exercises
- Provide confidence to next set of regulators
- Only if credit recognized good performance
- Only if credit recognized creativity, thinking out of the box

Survey and Vision Session Results

What would an exercise credit program like this look like?

- Several comments felt the credit should reflect verification of PREP Performance
- Whatever program is developed should be applied consistently, using standard definitions and objectives for all entities
- Several respondents indicated that more information is necessary



Preliminary Decisions and Rationale

- Exercise Credits – ADEC doesn't have a mechanism for credits.
- No minimum or maximum required training exercises that can be given a credit .
- When does a plan holder's regularly scheduled training exercise "count" as a .485 exercise?
- Improve ADEC's documentation of when an exercise meets .485 criteria.

Next Steps

- The information presented at today's workshop is intended as a continuation of ADEC's outreach process to gain stakeholder input as we continue to develop this program.
- Development process continues to be open to stakeholder comment.
- Submit written comments on information presented at stakeholder workshop
to: decexerciseprogram@alaska.gov **by May 19, 2017.**

Next Steps

- Next step is to develop a Draft Exercise Program Guidance Document (Target date of **late summer 2017**). The document will be circulated for review and comment.
- Final guidance complete? (Target of **year end 2017**).
- What to do in the meantime?

Next Steps

- The new guidance document will be maintained as a living document that will periodically be reviewed and updated to ensure it provides clear and current guidance and is responsive to feedback and programmatic lessons learned.

Next Steps

THANK YOU
for you coming and helping
on this important project.



Response Exercise Program Improvements Process Exercise Guidance Workshop

75 minute lunch break