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# Are We Overthinking ICS?

## *The proposed NIMS Refresh does more harm than good*

In a recent article titled [Hang On, Here We Go... Again](#) my colleague and friend of many years, George Whitney, raises concerns about the latest proposed revision to the National Incident Management System (NIMS). Specifically, Whitney questions the need to create an entirely new system, the Center Management System, to manage operations within the emergency operations center (EOC). He suggests that this might be a task best left to local emergency managers.

I believe there is an even bigger question that we must ask. Are we overthinking the Incident Command System?

### Context

The history of the development of ICS is well known and readily available on the Internet. However, there are a few key points that are often overlooked:

- ICS was developed to meet a specific *tactical* need: to coordinate the activities of multiple agencies responding to forest fires in California.
- ICS was developed as a system not an operational structure. The

developers of ICS had to first formulate a set of principles and management characteristics on which development of tactical field operations was based.

- The Multiagency Coordination System was intended to address operational coordination above the incident level and was actually developed after the tactical field component of ICS.
- Although adopted for use in disaster response, there is little evidence that ICS is used as intended or that it solves common response problems. In other words, there is very little research to support its use for operational and strategic management of response.

### Change creates problems

Shifting from responding a specific tactical problem to all hazards disaster management has involved considerable rethinking of ICS. This has not always been successful. From the beginning, the focus has been on the tactical structure rather than on the integration of ICS principles into organizations. For example, there was much discussion in the early days as what was “pure” ICS and whether there should be separate ICS for each responder type (e.g. police

ICS, Hospital ICS). To make matters worse, FEMA developed its own system for Federal response based on a functional approach that evolved into the Emergency Support Function (ESF) concept. Attempts to reconcile ICS and ESF have led to even greater confusion at the operational (i.e. EOC) level.

In a Journal of Emergency Management article, *The Evolution of Shortcomings in Incident Command System: Revisions have allowed critical management functions to atrophy*, researchers Kimberly Stambler and Joseph Barbera demonstrate how this shift to all hazards ICS resulted in the elimination of the ability to predict the status of an incident beyond the current operational period. Since a main function of the EOC is to anticipate operational requirements, this is a glaring lack in ICS at the operational level.

## MACS is out

Of further concern is the shifting view on the Multiagency Coordination System (MACS). For some reason, MACS has evolved from a relatively simple concept to something that even FEMA has trouble explaining.

Originally MACS was intended to provide operational level coordination off-site while ICS provided on scene management. This fits comfortable with the concept of the EOC and, indeed, the first MACS used something called the Operations Coordination Center. As ICS transitioned to an all-hazards concept, MACS came to be viewed as a system that in FEMA's words, "Defines business practices, operating procedures, and protocols and provides support, coordination, and assistance."

However, the proposed change to NIMS completely eliminates MACS as a system in favor of a MAC Group composed of agency

administrators with EOC as staff to the MAC Group. Essentially, the NIMS Refresh eliminates a key system for EOC management while renaming the Policy Group that has always been part of the EOC organizational structure.

## Is this trip really necessary?

To return to the original question, is all this tinkering with ICS really necessary? Are we overthinking things? The answer, in my opinion, is that we are. We do this for two reasons. First, we are too focused on ICS structure as opposed to ICS principles. Secondly, we are too committed to "one-size fits none" and that every response organization must look the same regardless of size or response strategy.

No two EOCs are the same. Some function as incident or area command posts, particularly in smaller jurisdictions; others are responsible solely for coordination. Some are organized under a functional approach; others use ICS. But even in Federal Joint Field Offices you will not find the fully staffed organization chart portrayed in guidance documents. Jurisdictions default to what works for them, not what the guidance documents say they should be doing.

The proposed CMS does nothing to resolve the problems of incident/EOC interface or the need for extended planning within the EOC. Instead, it eliminates existing mechanisms that could potentially address these needs. Instead, it will be boon for "Beltway Bandits" who will get to lucrative contracts to develop new training programs and guidance documents while placing new compliance requirements on already overburdened emergency managers.

Maybe we're not overthinking ICS but we certainly aren't thinking about it in the right way. 