

Miller, Diane M.

From: Jack Jarboe [jjarboe@gracesales.com]
Sent: Tuesday, April 18, 2006 4:39 PM
To: NIOSH Docket Office
Subject: Stakeholders' meeting -follow up comment

The following recommendation is a follow up to my comments offered at the NIOSH Stakeholders' Meetings in Washington DC, March 22, 2006.

The Problem

Incident command system (ICS) effectiveness, or the lack thereof, was mentioned by several speakers as one important element that is a contributing factor in firefighter injuries or deaths. The comments made by stakeholders are reinforced by the recommendations made by NIOSH investigators over the past ten years. This is a reoccurring problem in spite of:

- NFPA 1561 (Standard on Emergency Services Incident Management System)
- OSHA 1920.120 (incident command system requirements, the de facto OSHA general duty clause requirement for **effective** incident command operations on scene)
- Publication of the National Incident Management System (NIMS)

Moreover, the first response community is apparently reluctant to migrate from tactical work sheets and tactical work boards to automated ICS software applications that can facilitate more effective command post operations; by freeing command staff to better manage incident strategy, incident tactics and incident hazards.

At least two field tested and field proven ICS software products exist today that can increase command staff effectiveness. At least two other ICS software systems claiming such capability are under development, and may someday reach the point of being acknowledged as field tested and field proven. Popular acknowledgement alone however, is not enough to provide assurances needed by first responders to move to relatively new technology needed in the command post.

The Solution

Development of performance related ICS software tests which current and future software applications could be built to and tested against would provide a baseline that first responders could turn to when looking for automated help in the command post. NIOSH (as the agency with a proven track record in developing performance based technology testing standards trusted by first responders) is best positioned, equipped, and familiar with the necessary methodology to develop such a test.

The Consequences

If we fail to act now we will continue to see the same results. That is simply unacceptable considering the fact that solutions to these reoccurring problem are readily available. Elected officials and first response executives can no longer expect their incident command staff to effectively and safely manage millions of dollars of incident resources and tens to hundreds of first responders on scene, with currently accepted information management and decision support technology

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comprised of twenty five cents worth of paper and pencils. New technologies which can manage the mechanics of incident command can increase command staff effectiveness and thereby reduce first responder losses if the technologies are adopted and used. Adoption must therefore be facilitated through development of an ICS software performance test which first responders can rely upon when seeking faster, simpler, and easier technology to use in command post and area command centers.

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