Acknowledgments

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We encourage you to comment on these materials. Please give your suggestions to those leading the program in which you are now enrolled or click on ‘contact us’ at https://mwc.umn.edu.

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The material was prepared for use by instructors experienced in the training of persons who are or who anticipate responding to emergencies. Authors of this material have prepared it for the training of this category of workers as of the date specified on the title page. Users are cautioned that the subject is constantly evolving. Therefore, the material may require additions, deletions, or modifications to incorporate the effects of that evolution occurring after the date of this material preparation.

Disclaimer

The Occupational Safety and Health Administration (OSHA) rule to help ensure worker health and safety during emergency response activities requires specific training for members of the response team, depending upon the duties to be performed.

Emergency response activities are conducted within a structured framework called the Incident Command System and an Emergency Response Plan (ERP); at locations where employees will evacuate and await external personnel to conduct the response an Emergency Action Plan (EAP) is required.

This is an Awareness level program and does not meet the requirements for serving
as an Incident Commander at an actual response. To serve as an Incident Commander, additional training is required, including an initial 24-hours of training at the Operations level. To coordinate an evacuation, additional training is also required and must be documented.

For further information about the training requirements for workers under either of these Plans, consult the training facilitator and/or your company ERP or EAP and your health and safety representative.

These materials were updated on September 12, 2023 and all weblinks are active as of that date; if any errors are found please notify your facilitator so they can be updated.
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Introduction

During this program, you will learn the functions of the Incident Commander and others who participate in an emergency response.

The functions of those involved when an evacuation only will be conducted (no response) are also covered; in this situation, on-site workers will move to a safe area and await outside responders.

You also will discuss some of the functions of management during an emergency.

Objectives

When you finish this program, you will be better able to do the following:

- Recognize the need for planning in advance of a potential emergency
- Identify the response capabilities at your facility
- Distinguish between Emergency Response Plan and Emergency Action Plan
- Identify response needs and training provided

We want you to participate in the program. Please ask questions about anything that you do not understand and/or anything you would like to have discussed in more detail.
Emergencies are costly

A catastrophic explosion in the power plant at the Ford Rouge Complex resulted in the deaths of 6 workers and serious injuries to 14 other employees. In addition to the injuries and loss of life, the explosion resulted in the loss of the following services: steam, compressed air, cooling water, building heat and air conditioning, telephone service and fire protection water. The incident involved fire response from the Rouge Fire Department, the Dearborn Fire Department, and the Detroit Fire Department. The medical response was coordinated by the Rouge Medical Center and involved various ambulance services and regional hospitals. Because of possible asbestos and PCB contamination, the explosion also necessitated an environmental response. Dearborn Engine and Stamping resumed limited production the next day; Dearborn Assembly, Glass and Frame plants resumed six days later; Dearborn Tool & Die resumed operations in about two weeks; and Rouge Steel resumed iron and steel production about three months after the explosion occurred. On the seventh anniversary of the explosion, the Michigan Department of Consumer and Industry Services (MIOSHA) concluded its investigation of the explosion with a $7 million settlement agreement with Ford Motor Company and the United Auto Workers.

Many industrial facilities have the potential to experience an emergency that impacts employee health and safety. Assume that your facility has experienced a fire in one of your critical operations, such as the power generation plant or a piece of machinery that is critical to your operation. Also assume that the fire has resulted in smoke inhalation to several employees, requiring a medical response. Finally, assume that a hazardous chemical has also been released in a quantity to cause a health and safety risk to employees, or the community.

During this program, you will discuss how your facility would respond to such an incident. You will also learn about the roles of management during an emergency response.

Need for Planning

When an event happens that can cause harm to workers, property, or the environment, it is too late to decide how to respond to limit damage. Pre-planning is essential for an orderly, effective response.
What Is an Emergency?

A hazardous material emergency is a spill or release of hazardous materials that cannot be controlled without outside help. This definition also includes the threat of a spill or release.

The legal definition of hazardous material emergency is found in health and safety regulations. In the OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) standard, "outside help" means anyone other than employees working in the immediate area or maintenance personnel. Spills or releases can occur on land, in the air, or in water.

A broader definition of emergency is any situation that may

- threaten health and safety of workers, customers, or the public
- disrupt or shut down operations
- damage property or infrastructure
- damage the environment

This includes chemical spills or releases, but also earthquakes, floods, wildfires, winter cold/ice and summer heat, tornadoes, infectious or foodborne disease outbreaks, releases of biological agents, explosions involving nuclear or radiological sources, and workplace violence. Many potential emergencies can be anticipated in the planning process, which can help employers, workers and the public plan to reduce the risk of an event when possible and respond more safely when necessary.

The Required Plan - Emergency Response Plan or Emergency Action Plan

Standard Operating Procedures (SOPs) are carefully planned and detailed work instructions intended to enable workers to carry out work tasks safely. Some SOPs are used in routine plant operations; others provide guidelines for actions that should and should not be taken during an emergency.

Dealing with any unexpected release requires a plan. The Emergency Response Plan (ERP) is a comprehensive, written SOP detailing what will be done in emergency situations where some response will be done by employees. This SOP includes important information needed for responding to hazardous materials emergencies. All employers with hazardous substances which could be released must have an ERP or determine that they will evacuate employees and call in outside help, 29 CFR 1910.120(q)(1).
An Emergency Action Plan (EAP) is required if evacuation is selected and response will be conducted by outside personnel. The EAP is a structured SOP describing aspects of safe evacuation practices (29 CFR 1910.38). The EAP must be in writing if there are more than 10 employees; if 10 or fewer employees, the plan can be communicated verbally.

The requirements for an ERP and EAP are the focus of this program. Both approaches to maintaining health and safety in an emergency use a structured system to help ensure preplanning is conducted and procedures practiced, the actions taken are organized and follow the plan, and identified up is conducted after the emergency.

In addition to the standards noted above, see Fire Brigades (29 CFR 1910.156); and Permit-Required Confined Spaces (29 CFR 1910.146(k)). The OSHA Publication, Principal Emergency Response and Preparedness Requirements in OSHA Standards and Guidance for Safety and Health Problems, provides a listing of emergency planning requirements in OSHA standards as of 2004 for both General Industry (29 CFR 1910) and Construction (29 CFR 1926). Consensus standards from the National Fire Protection Association (NFPA), American National Standards Institute (ANSI) may also be useful.

The following activity is an opportunity to assess current awareness of emergency planning at your workplace.
Activity 1 – Company Assessment

Using knowledge of your facility, answer the following questions.

1. What is the name of the emergency planner? _______________________________________

2. What types of hazards/activities exist at your facility? For which of the following types of emergencies have employees at your facility been trained? (Check all that apply.)

<table>
<thead>
<tr>
<th>Potential Hazard/Activity</th>
<th>Exists</th>
<th>Training</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medical</td>
<td>□ Yes</td>
<td>□ No</td>
</tr>
<tr>
<td>Flood</td>
<td>□ Yes</td>
<td>□ No</td>
</tr>
<tr>
<td>Fire</td>
<td>□ Yes</td>
<td>□ No</td>
</tr>
<tr>
<td>Weather event</td>
<td>□ Yes</td>
<td>□ No</td>
</tr>
<tr>
<td>Power outage</td>
<td>□ Yes</td>
<td>□ No</td>
</tr>
<tr>
<td>Hazardous materials release</td>
<td>□ Yes</td>
<td>□ No</td>
</tr>
<tr>
<td>Rescue (list type)</td>
<td>□ Yes</td>
<td>□ No</td>
</tr>
</tbody>
</table>

Security (bomb threat, active shooter) □ Yes □ No □ Yes □ No

Other. Please list                                   □ Yes □ No □ Yes □ No

3. Does your Emergency Response Plan or Emergency Action Plan describe how personnel will respond to each of the potential emergencies checked above?

□ Yes □ No □ Don’t Know

4. Who is responsible for approving your Emergency Response Plan or Emergency Action Plan?

________________________________________________________

5. Have specific individuals at your facility been appointed and trained to take charge in an emergency?

□ Yes □ No □ Don’t Know
Incident Command System

The Incident Command System (ICS) is a standardized framework designed to enable an organized and efficient use of resources for a response. It combines an integration of facilities, equipment, personnel, procedures and communication that is applicable to a single facility or a multi-site corporation.

The ICS is used by municipal firefighters and designated emergency response teams who respond to, contain, or control releases or other incidents. The emergency response activities covered by HAZWOPER, requires employers where a response will be undertaken to develop and implement a site-specific Emergency Response Plan that includes use of the Incident Command System (29 CFR 1910.120 (q)(1)). The ICS is an organized, structured scheme that uses uniform titles and describes specific functions for various participants in the response; this reduces the time needed to identify who does what activities in a response and allows for efficient communication among responders.

Planners who are preparing for a team to manage an evacuation before offsite, outside responders come on site to deal with the emergency also will use a structured chain of command to ensure that when the plan is activated, everyone knows what to do to ensure that workers exit to a safe location in a timely and orderly process.

Objectives

When you finish this program, you will be better able to do the following:

- List reasons for an organized structure
- Identify required content of plans
- Identify the functions of the personnel designated in the structure
- Match function of personnel with required training
- Assess preparedness
- Identify the functions of management personnel during an emergency response
Emergency Response Plan ICS Structure

An Emergency Response Plan (ERP) is required at all plants where a hazardous materials emergency response will include plant personnel. A hazardous materials emergency is a spill or release that cannot be controlled without outside help. OSHA defines "outside help" to mean anyone other than employees working in the immediate area or maintenance personnel. The ERP must be in writing. It must be developed and practiced before an emergency occurs that requires a response. The ERP should be a living document that is revised at least annually based on experiences during response efforts, as well as new processes that are added, new hazard information that becomes available, or changes in the level of response by site personnel.

The specific topics which must be covered in the ERP are:

- Pre-emergency planning and coordination with outside parties
- Personnel roles, lines of authority, training, and communication
- Emergency recognition and prevention
- Safe distances and places of refuge
- Site security and control
- Evacuation routes and procedures
- Decontamination procedures
- Emergency medical treatment and first aid procedures
- Emergency alerting and response procedures
- Critique of response and follow-up
- Emergency response equipment
- Emergency response

According to 29 CFR 1910.120(q)(2), the local or state emergency plan may be included as part of the ERP to avoid duplication.
The organization of the response team is described in detail in the ERP. An example of the structure of a response team follows, using the standard terms in the National Incident Management System (NIMS). This system was promoted after the 9/11 attack where the need for uniform terminology was identified as essential to ensure effective communication between parties.

Key functions of the Incident Commander (person in charge of a response), and response team members in the Command Staff and General Staff are shown below: (reference under figure above).

Source: https://training.fema.gov/nims/
Incident Commander – (The person in charge who oversees all aspects of the response)
Functions:

- Establishes a single Incident Command Post (ICP) for the incident
- Establishes consolidated incident objectives, priorities, and strategic guidance, and updating them every operational period
- Selects a single section chief for each position on the General Staff needed based on current incident priorities
- Establishes a single system for ordering resources
- Approves a consolidated IAP for each operational period
- Establishes procedures for joint decision making and documentation
- Captures lessons learned and best practices

Command Staff (see figure above)

Public Information Officer (PIO)
Functions:

- Interface with public, media and/or other agencies with information needs
- Gathers, verifies, coordinates and disseminates information to both internal and external parties
- Monitors the media and other sources and provides information to relevant components of the responders
- Releases accurate information concerning the incident after it is cleared by the Incident Commander

Safety Officer
Functions:

- Reports directly to the Incident Commander
- Monitors incident operations
- Advises the IC on health and safety matters of incident personnel
- Establishes the systems and procedures to assess, communicate and mitigate hazardous environments
  - Developing and maintaining the Safety Plan
  - Coordinating safety efforts
  - Implementing measures to promote safety
- Stops or prevents unsafe acts
Liaison Officer
Functions:

- IC’s point of contact for representatives from agencies such as fire and law enforcement or other jurisdictions
- Receives input from outside groups to maintains communication between outside agencies and in-house response
- Point of contact to facilitate coordination of assisting or cooperating agencies or jurisdictions

General Staff (see figure above)

Operations Section, led by Section Chief
Functions:

- Section Chief appointed by the IC; assigned personnel may change as the incident evolves
- Directing management of tactical activities to achieve objectives established by the IC
- Developing and implementing strategies and tactics to achieve incident objectives
- Section Chief organizes the group to meet the needs, maintain manageable span of control and optimize use of resources
- Supporting Action Plan development for each part of the response

Planning Section, led by Section Chief
Functions:

- Collect, evaluate and disseminate incident information to the IC or other personnel
- Prepare status reports, display information, maintain the status of resources
- Facilitate the incident action planning process and prepare the incident Plan sing input from other sections and command staff and IC guidance
- Facilitate incident planning meetings
- Record status of resources and anticipated needs
- Collecting, organizing, displaying and disseminating status information and analyzing the situation as it changes
- Planning for the orderly, safe and efficient demobilization of resources
- Collecting, recording and safeguarding incident documents
Logistic Section, led by Section Chief
Functions:

- Ordering, receiving, storing/housing and processing incident-related resources
- Providing ground transportation during an incident, maintaining and supplying vehicles, keeping vehicles usage records and developing incident traffic plans
- Setting up, maintaining, securing and demobilizing incident facilities
- Determining food and water needs, including ordering food, providing cooking facilities, maintaining food service areas and managing food security and safety (in cooperation with the Safety Officer)
- Maintaining an incident Communications Plan and acquiring, setting up, issuing, maintaining and accounting for communications and IT equipment
- Providing medical services to incident personnel

Finance/Administration Section, led by Section Chief
Functions:

- Tracking costs, analyzing cost data, making estimates and recommending cost savings measures
- Analyzing, reporting and recording financial concerns resulting from property damage, responder injuries or fatalities at the incident
- Managing financial matters concerning leases and vendor contracts
- Managing administrative databases and spreadsheets for analysis and decision making
- Recording time for incident personnel and leased equipment

Additional functions may be integrated into the ICS. For example, in a response that could involve criminal activity, an Intelligence/Investigations Section might be activated by the IC.
Emergency Action Plan Command Structure

An Emergency Action Plan (EAP) is required at any workplace where management has decided that workers will evacuate when a hazardous materials or other emergency occurs, and the response will be conducted by outside personnel. At some facilities, both an ERP and an EAP may be in place for different parts of the operation.

The following must be in the EAP, as shown in 29 CFR 1910.38(a)(2):

- Emergency escape procedures and emergency route assignments
- Procedures to be followed by employees who remain to operate critical plant operations before they evacuate
- A procedure to account for all employees after the emergency evacuation has been completed
- Rescue and medical duties for those employees who are to perform them
- Preferred means of reporting fires or other emergencies
- Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan

If the decision has been made to evacuate and rely on outside responders, an EAP is required. An example of an Evacuation Team structure in an EAP is shown below:

![Evacuation Team Structure Diagram](image-url)
Incident Command System Awareness

In the above figure, there are offensive and defensive actions, both directed by an Incident Commander who may be shown in the EAP as ‘person in charge’.

An IC or (other title of the designated person in charge) oversees all EAP activities.

**Person in Charge/Leader/Evacuation Coordinator/Incident Commander**

Functions:

- Responsible for determining need to evacuate
- Directs all aspects of the evacuation
- Establishes command post or communication center
- Maintains ongoing communication with team members
- Coordinates with off-site personnel
- Keeps a log of all activities

The offensive actions involve a limited number of personnel who will ensure shut down of key systems.

The evacuation actions are conducted by the defensive group. Examples of functions of some of the Defensive team members may include:

**Building Captain**

Functions:

- Reports to Incident Commander/Leader/Evacuation Coordinator
- Identifies any disabled person(s) requiring assistance

**Floor Captain**

Functions:

- Reports to Building Captain
- Performs evacuation head count

**Support Personnel**

Functions:

- Reports to Floor Captain
- Monitors assigned location—Tunnel, Escalator, Elevator, Exit, Stairwell, other

**Sweepers**

Functions:

- Reports to Floor Captain
- Ensures all personnel in the area have evacuated
A full listing of functions is in the workplace specific EAP. OSHA guidance in developing an EAP is shown here:

In both the ERP and EAP structures, there is a single person in charge. In an ERP, the person in charge is the IC, regardless of routine job title, such as Plant Manager or Emergency Manager; in an EAP, the person in charge is often titled ‘person in charge’. The function in either Plan is to oversee the actions of everyone in the command structure.

Communication is the Key

NIMS was established to improve communication among public sector responders and those seeking assistance by using a uniform set of terms

- An ERP should include NIMS terms
- Training must include NIMS terms
- Training coordination with outside responders is detailed in the ERP

Private sector employers are not required to use NIMS, but use may facilitate communication with responders who likely include public sector employees.

NIMS-trained personnel, such as local fire department responders, may assist at work sites covered by an EAP.

- Plan for communication by meeting with responders BEFORE an incident
- Update responders when changes are made to the EAP
- Train with outside personnel included in the EAP

If you have an EAP, it is critical that outside personnel who may be called to the workplace be aware of your terminology, and you of theirs.

ERP or EAP - communicate in advance with responders who may assist when the plan is activated; if possible do drills or tabletop exercises with responders.
Training

This training program is one in a series related to managing emergencies.

Programs are available for community members, municipal employees and industrial workers who may discover a hazardous material (awareness), prevent the spread of a spill (operations), or control the release of a hazardous material (technician). Those trained at the operations level may take additional training to become an Incident Commander in a response.

Responding to an emergency

For safe response to an emergency, you must be adequately trained. The level of training defines the activities that you can conduct. There are five distinct levels of training. Each is described below, beginning with the least specialized level.

Awareness Level
Function: Identify an event (release or unusual circumstance) and alert appropriate personnel

- Understand hazardous materials and associated risks
- Understand potential outcomes of emergencies
- Able to recognize hazardous materials
- Able to identify hazardous materials if possible
- Understand role of emergency responder
- Know how to contact appropriate personnel

Operations Level
Function: Performs defensive actions to prevent spread of contamination (contain)

- Demonstrated Awareness level competencies
- Know basic hazard and risk assessment techniques
- Can properly use and select the personal protective equipment that is provided
- Know basic hazardous materials terms
- Can perform basic control, containment, and/or confinement operations
- Know basic decontamination
- Understand relevant standard operating procedures
- Can perform termination procedures
Technician Level
Function: Performs offensive action to stop release (control)

- Demonstrated Awareness and Operations level competencies
- Able to implement an Emergency Response Plan
- Can identify, classify, and verify materials using air monitoring instruments and field survey techniques
- Know toxicological terms and behaviors
- Can perform advanced control, containment, and/or confinement operations
- Able to select and decontaminate personal protective equipment
- Understand risk assessment and incident command
- Understand and can implement termination procedures

Specialist
Function: Performs offensive action for specialized response (e.g., chlorine release)

- Completed training at the Awareness, Operations, and Technician levels
- Know how to implement the local emergency response plan
- Know the state emergency response plan
- Able to develop a site safety and control plan

Incident Commander
Function: In charge of response actions

- Completed training at the Awareness and Operations levels
- Ability to implement incident command system and emergency response plan
- Understand hazards for employees working in personal protective equipment
- Know the state emergency response plan and the federal regional response team plan
- Understand the importance of decontamination procedures

More information and specific skills of each level are found in 29 CFR 1910.120(q).
Evacuation

For evacuation, procedures must be included in the EAP for several roles (e.g., accounting for all employees, rescue, medical), but no specific training content is shown for each role. Rather, the following is specified in 29 CFR 1910.38(e):

An employer must designate and train employees to assist in a safe and orderly evacuation of other employees.

Training content should be included in the EAP.

Other related training

Training requirements for specific hazards are found in OSHA standards. Several are listed below:

- Respiratory Protection 29 CFR 1910.134
- Confined Space 29 CFR 1910.146
- Control of Hazardous Energy 29 CFR 1910.147
- Blood-borne Pathogens 29 CFR 1910.1030

It is essential that adequate training be provided in advance for each activity that may be needed during the response or evacuation and that no one perform activities beyond their level of training.
Activity 2 – Determining Training Levels

What is the level of training needed to perform each of the actions below? Why?

1. Turn a valve in the field adjacent to the power plant to stop the flow of fuel to the plant.

2. From an upwind distance of 150 feet, use binoculars to see if any labels can be identified on barrels stacked beside the power plant.

3. Authorize sounding the alarm to evacuate the day care center.

4. Go to the trailer of flammable liquid that was hauled in just before the explosion and try to stop the leak which occurred as a result of flying debris from the blast.

5. Respond to a chlorine release at the water treatment plant due to power failure.

6. Oversee the entire response.
7. Help the response team members into Level A suits so that they can approach a process chemical line that is ruptured.

8. Talk with the media regarding the emergency.

9. Lead the critique of the incident.

10. Ensure that all follow-up actions are completed.

11. Identify persons who need assistance in evacuating.

12. Rescuer or First Aid personnel

13. Critical plant operations personnel

14. Reporting a fire on the line
Activity 3 – Assessing Emergency Response

For each of the items below, evaluate whether your company is prepared. If you are not sure, show needed follow-up information you need, including who could be contacted to obtain the information.

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Follow-Up Needed/Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Most hazards have been identified.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>The ERP or EAP is available for workers.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>After the last emergency, follow-up actions were identified and completed.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Functions of response team members have been discussed.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Everyone is trained to identify an emergency (Awareness Level).</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Management is committed to health and safety.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>ICS/Evacuation Coordinator system is in place.</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>
Actions/Support Needed from Management

Several of the items in the previous exercises are outside the responsibilities of the emergency responders and require the active involvement of management. These items include:

- Dealing with the media after the response
- Assuring necessary resources before and during the emergency
- Providing resources to accomplish post-emergency termination remediation
- Providing resources to implement administrative changes based on the required incident critique

Depending upon the extent of an emergency and the company structure, corporate and local management may support some of these responsibilities.
Activity 4 – Functions of Management to Support the Team

A fire has occurred in one of your critical operations (power generation or a critical piece of machinery). Several employees were not able to exit the area immediately and inhaled smoke. A hazardous substance was also released during the fire that prevented Emergency Response Team members from approaching the point of release with available protective equipment.

1. How would management receive notification of such an event?

2. What actions could management take that would help the Incident Commander during the initial actions?

3. What prior actions might have assisted in this response?
Summary

- Emergency Response Team
  - Emergency Response Plan (ERP)
  - Structure of the Incident Command System (ICS)
  - Function of the Incident Commander (IC)
- Evacuation Team
  - Emergency Action Plan (EAP)
  - Structure of the Evacuation Team
  - Function of the Person-in-Charge/Coordinator/Incident Commander
- Matching Training to Activities
- Functions of Management
Closing and Program Evaluation

Thank you for participating in this program. Are you better able to do the following?

- Recognize the need for planning in advance of a potential emergency
- Identify the response capabilities at your facility
- Distinguish between Emergency Response Plan and Emergency Action Plan
- Identify response needs and training provided
- List reasons for an organized structure
- Identify required content of plans
- Identify the functions of personnel designated in the structure
- Match function of personnel with required training
- Assess preparedness
- Identify the functions of management personnel during an emergency response

This is an opportunity to ask any questions you may have, or to discuss how the knowledge and skills learned can be used at work. Were all your initial questions answered?

Please take the next 10 minutes to complete the program evaluation forms. These are important for improving the program. The Midwest Consortium does take your comments seriously and has made changes in content and the skill exercises based on feedback. Your comments are anonymous.

We hope to see you at another Midwest Consortium program in the future.