

DOCUMENTATION UNIT LEADER (DUL) JOB AID

Overview

Position:

In minor incidents staff of existing field units might perform this function. As incidents escalate, the only individuals capable of doing this job are those who have had several years of experience with large-scale incidents and/or the opportunity to see a documentation package from its inception to the point where it is challenged in court by a responsible party. The DUL should understand how an incident archive can meet the challenge of judicial or administrative review.

Section: Planning Section

Mission:

To maintain accurate and complete incident files, provide duplication services to incident personnel, store incident files for legal, analytical, and archival purposes. Key goals include:

- Assess initial incident
 - Establish comprehensive documentation system, including CERCLA administrative record
 - Maintain effective documentation during demobilization
 - Develop a single, central, comprehensive archive
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Duties:

- ❑ Report to the Planning Section Chief for situation briefing.
- ❑ Establish work area with files and photocopier.
- ❑ Retain and file duplicates of official forms and reports.
- ❑ Accept and file reports and forms submitted to unit.
- ❑ Check the accuracy and completeness of records submitted.
- ❑ Correct errors or omissions by contacting appropriate ICS Units.
- ❑ Provide duplicates of forms and reports to authorized requesters.
- ❑ Prepare incident documentation for Planning Section Chief when requested.
- ❑ Maintain, retain, and store incident files for use after demobilization.
- ❑ Maintain unit log (ICS form 214).

References

Below is a list of references that may be required while using this job aid:

- Oil Spill Field Operations Guide (ICS OS-420-1)
- OPA 90 Statute
- U.S. Historical Preservation Agency (USHPA) Manual
- 40 CFR 300
- CERCLA Administrative Record

Overview (cont'd)

Materials

Ensure that these materials are available to the Documentation Unit Leader during an incident, if not already provided in a unit or section specific support kit.

- Large locking file cabinets
- Large folding tables
- Cardboard boxes (at least 3 dozen)
- Hanging file folders
- Backing boards
- Copiers
- Photograph archival sleeves
- "Historian" or "Archive Copy" red stamp
- Stamp for back of photos for ID data
- Two-hole punch
- Three-hole punch
- Fax Machine
- Laptop Computer
- ICS Forms Catalog

General Information Use clear text and ICS terminology (no codes) in all radio transmissions.

All radio communications to Incident Communications Center will be addressed: "(Incident Name) Communications".

Initial Actions

General Tasks

Below are the initial actions to take by someone assigned as Documentation Unit Leader.

STEP	ACTION	✓
1.	Receive assignment	<input type="checkbox"/>
2.	Upon arrival at the incident, check-in at designated check-in locations. Check-in locations may be found at: <ul style="list-style-type: none">• Incident Command Post• Base or Camps• Staging Areas• Helibases	<input type="checkbox"/>
3.	Receive briefing from Planning Section Chief <ul style="list-style-type: none">• Size and complexity of incident• Expectations of the IC• Incident objectives• Agencies/organizations/stakeholders involved• Incident activities/situation• Special concerns	<input type="checkbox"/>
4.	Begin/maintain Unit Activity Log (ICS 214)	<input type="checkbox"/>
5.	Acquire work materials listed on page 2	<input type="checkbox"/>
6.	Set up work space	<input type="checkbox"/>
7.	Organize, assign, and brief subordinates	<input type="checkbox"/>

Initial Incident Assessment

Establish Working Relationships

Use the checklist below to ensure that critical relationships are set up properly.

STEP	ACTION	✓
1.	Ascertain expectations of IC and Planning Section Chief relevant to documentation	<input type="checkbox"/>
2.	Establish command support for Documentation Unit having unrestricted access to sites and meetings	<input type="checkbox"/>
3.	Establish command support for the Documentation Unit as the repository for all documentation and prohibiting individual staff elements from unilaterally deciding documentation needs	<input type="checkbox"/>

Assess Incident Parameters

Use the checklist below to obtain a complete understanding of the incident scope.

STEP	ACTION	✓
1.	Physically tour ICP and establish contact with Command and General Staff, Unit Leaders and other personnel assigned to the incident/event to ensure they are aware of the documentation/historical data needed	<input type="checkbox"/>
2.	Develop list of ongoing policy meetings <i>Examples: Daily ops briefings, safety meetings</i>	<input type="checkbox"/>
3.	Identify ancillary documentation duties, for potential incorporation into DU responsibilities <i>Examples: Ops photo documentation, USHPA/SHPO coordination, fax support, duplication support, ops support, FOIA control</i>	<input type="checkbox"/>
4.	Develop complete understanding of the functions and organizational relationships of all staff and operational response elements to determine desired documentation products	<input type="checkbox"/>

Initial Incident Assessment (cont'd)

**Coordinate With
Legal And Finance**

Ensure that required legal aspects are considered.

STEP	ACTION	✓
1.	Establish contact/determine POCs for all external real time and post response users, specifically including district legal rep, G-LCL rep, NPFC Case Officer, and NPFC EPA Liaison Officer (if appropriate)	<input type="checkbox"/>
2.	Ascertain areas of concern and ultimate documentation needs for contacts made in Step 1	<input type="checkbox"/>
3.	Coordinate ongoing functions w/ relevant resource <i>Example: FOIA control with Servicing Legal Office</i>	<input type="checkbox"/>
4.	Ascertain status of all issues relative to OPA90 liability limits and relevant documentation needs	<input type="checkbox"/>
5.	Determine requirement for a CERCLA Administration Record and establish timeline for meeting statutory deadline	<input type="checkbox"/>

**Identify Document
Originators**

Determine how best to gather documentation from other ICS elements.

STEP	ACTION	✓
1.	Identify information loops which originate, produce or process documentation during the response, on scene and off-site <i>Examples: Command correspondence, SSC, OPS, Finance, Logistics, e-mail</i>	<input type="checkbox"/>
2.	Determine how each information loop can most easily be accessed so that generated documentation can be collected by DUL	<input type="checkbox"/>
3.	Determine if documents processed by each activity are dynamic (undergoing sequential changes/additions), or static (one time completed report)	<input type="checkbox"/>

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Initial Incident Assessment (cont'd)

Identity Document Originators (cont'd) The checklist for determining how best to gather documentation is continued below.

STEP	ACTION	✓
4.	Determine the best time to collect each document type <i>Examples: Does DU need interim copies or dynamic docs for OPS support or as internal tickler file?</i>	<input type="checkbox"/>
5.	Analyze all broad-based communications mechanisms within the organization and develop a means to access transmitted material (even if it is redundant) <i>Examples: Faxes, e-mail, message traffic</i>	<input type="checkbox"/>
6.	Determine where DU personnel can be inserted into processes/loops to offset documentation workload within an activity and facilitate collection NOTE: This technique is useless if it isn't clear that these personnel are DU personnel doing DU work within the relevant activity	<input type="checkbox"/>
7.	Establish an overall collection plan from emergency phase through demobilization, project and termination phases	<input type="checkbox"/>
8.	Continuously monitor collection loops for changes and effectiveness	<input type="checkbox"/>

Initial Incident Assessment (cont'd)

Brief IC On Assessment Finding

Based on the foregoing incident assessment, decide on the best organizational position for the DUL.

STEP	ACTION	✓
1.	Meet with IC concerning the initial assessment and revise expectations	<input type="checkbox"/>
2.	Review organizational placement of DUL given incident conditions (length of response, scope of response, or other factors) which would trigger change of organization structure from planning adjunct to staff element <i>Example: Type 3 to type 2</i>	<input type="checkbox"/>
3.	Establish collateral responsibilities <i>Examples: Photo documentation, USHPA fax, duplication, ops support</i>	<input type="checkbox"/>

Comprehensive Documentation System

**Ensure
Documentation
Complete/Accurate**

Set up a system to review documentation being collected, identify defects, and correct deficiencies.

STEP	ACTION	✓						
1.	Compare documentation being collected with assessment of overall activities	<input type="checkbox"/>						
2.	Identify areas where activity exists without corresponding documentation or with inadequate or insufficient documentation	<input type="checkbox"/>						
3.	If systemic problems exist, go to Step 6	<input type="checkbox"/>						
4.	Review the collated material daily to ensure all relevant and ancillary materials are being collected	<input type="checkbox"/>						
5.	Review documentation to determine: <table border="1" data-bbox="631 884 1265 1037"> <thead> <tr> <th>IF Defects are:</th> <th>THEN:</th> </tr> </thead> <tbody> <tr> <td>Incidental</td> <td>Correct immediately</td> </tr> <tr> <td>Systemic</td> <td>Go to Step 6</td> </tr> </tbody> </table>	IF Defects are:	THEN:	Incidental	Correct immediately	Systemic	Go to Step 6	<input type="checkbox"/>
IF Defects are:	THEN:							
Incidental	Correct immediately							
Systemic	Go to Step 6							
6.	Meet with relevant supervisor	<input type="checkbox"/>						
7.	Cooperatively design a solution that will meet the documentation need with the minimum amount of operational intrusion possible	<input type="checkbox"/>						
8.	If incident is in response state go to Step 4	<input type="checkbox"/>						

Comprehensive Documentation System (cont'd)

Respond to FOIA Requests

Establish expeditious procedures to handle Freedom of Information Act (FOIA) requests during the incident response phase.

STEP	ACTION	✓
1.	Write an incident specific Information Request Protocol for FOIA requestors indicating which documentation will be immediately available and providing assurance the requestor will be notified when the archive is complete	<input type="checkbox"/>
2.	Coordinate text of Information Request Protocol with legal officer or legal office which has jurisdiction	<input type="checkbox"/>
3.	Issue this protocol as the SOLE response to all FOIA requests related to the response	<input type="checkbox"/>

Effective Demobilization Documentation

Assess Demobilization Documentation

Determine how documentation collection will change during incident demobilization phase.

STEP	ACTION	✓
1.	Monitor operational status of each staff and operational element	<input type="checkbox"/>
2.	Identify any structural/organizational changes which will occur concurrently with demobilization	<input type="checkbox"/>
3.	Make any necessary adjustments to the standing documentation collection process	<input type="checkbox"/>
4.	Follow this same process for any incremental demobilization	<input type="checkbox"/>
5.	Continue monitoring the documentation collection process begun in the Comprehensive Documentation System job aid	<input type="checkbox"/>

Collect Files At Activity Demobilization

Arrange for Documentation Unit personnel to collect files during the demobilization phase.

STEP	ACTION	✓
1.	Ensure that the Demobilization Plan integrates documentation collection personnel into each element's demobilization	<input type="checkbox"/>
2.	<p>Have DU personnel physically demobilize each element</p> <ul style="list-style-type: none"> • Ensure no materials are destroyed • Ensure no materials are dispersed to other units <p>NOTE: In instances where materials need to accompany departing personnel for continuing off-site work, make arrangements for departing personnel to take duplicates and for the forwarding of newly originated or processed materials from off-site locations</p>	<input type="checkbox"/>
3.	Monitor off-site post-demobilization functions for collection and centralization	<input type="checkbox"/>

Comprehensive Archive

Review Documentation From Incident

Review the raw documentation material gathered during the incident.

NOTE: This is primarily a project phase accomplishment.

STEP	ACTION	✓
1.	Locate work area near final location of archive and set up several large folding tables	<input type="checkbox"/>
2.	Unpack boxes of collected materials and ascertain nature or materials	<input type="checkbox"/>
3.	Record unit name and phone number of originators/workers on contact list	<input type="checkbox"/>

Sort By General Subject Area

Organize the raw material.

STEP	ACTION	✓
1.	Develop chart of overall scope of operations based on extent/scope of collected documentation	<input type="checkbox"/>
2.	Develop general sub categories or activities <i>Examples: Ops, H&S, Finance, Personnel, A/V, PA</i>	<input type="checkbox"/>
3.	Do a preliminary sort of the unprocessed raw documentation into the sub categories above	<input type="checkbox"/>

Obtain Missing Files

Determine if there are substantial holes in the documentation files.

STEP	ACTION	✓
1.	Compare scope of documentation reviewed during initial sorting with the scope of the operation NOTE: Compile a list of all supporting agencies operating under the aegis of the FOSC	<input type="checkbox"/>
2.	Identify areas where an activity existed but documentation of that activity is either missing or only present in part NOTE: This process relates to classes or types of documentation, NOT individual documents	<input type="checkbox"/>

Comprehensive Archive (cont'd)

Identify Missing Files (cont'd)

The checklist for determining if there are holes in the documentation files is continued below.

STEP	ACTION	✓
3.	Determine whether the missing documentation was not compiled or is located elsewhere <i>Examples: NSF Strike team case files, MSC computer read outs, Navy SUPSAL docs, ATSOR Reports, reports for specialists (checklists)</i>	<input type="checkbox"/>
4.	Determine where missing documentation is located	<input type="checkbox"/>
5.	After relevant input from legal and finance post response users, coordinate collection of missing documentation NOTE: Originals, not copies, should reside in the archive	<input type="checkbox"/>
6.	Prepare a historian memo with relevant details for existing documentation that is not collected immediately for use in future collection	<input type="checkbox"/>

Compile Individual Subject Files

Organize and quality control check the individual files.

STEP	ACTION	✓
1.	For each general area of documentation determine how many individual types of files exist within that general category <i>Examples: H&S – Tailgate Safety Sign-up sheets; daily safety meeting minutes; individual site safety plans; OSHA reportable logs</i>	<input type="checkbox"/>
2.	Compile master file for each individual documentation sub-set	<input type="checkbox"/>

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Comprehensive Archive (cont'd)

Compile Individual Subject Files (cont'd)

The checklist for organizing and quality checking individual files is continued below.

STEP	ACTION	✓
3.	Quality control check each document within each file <i>Examples: Are all pages present? Are the DTGs on POLREP messages correct? Are dates correct? Is the best copy or original in the file?</i>	<input type="checkbox"/>
4.	Stamp each document in the master file with a "Historian" or "Master" stamp to indicate it is the archive copy	<input type="checkbox"/>
5.	Place files on a file backer	<input type="checkbox"/>
6.	Prepare an archive cover sheet for the file with appropriate handling instructions <i>Example: Archive materials: do not remove without permission of Historian</i>	<input type="checkbox"/>
7.	Place file in a labeled hanging file folder	<input type="checkbox"/>
8.	Place hanging folders in cabinets within appropriate general subject area <i>Example: H&S, Ops, Finance</i>	<input type="checkbox"/>
9.	Number each cabinet and drawer <i>Example: Cabinet 3, Drawer B</i>	<input type="checkbox"/>

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Comprehensive Archive (cont'd)

Document Discrepancies

A memo is needed for each master file which documents all of the discrepancies discovered during this quality control review.

STEP	ACTION	✓
1.	Write individual historian memos for the file to delineate each discrepancy or anomaly discovered while compiling each individual master files <i>Examples: "The number of this POLREP is wrong – it should be POLREP #12 vice #13"; or "There was no daily safety message written for 19 Sept."</i>	<input type="checkbox"/>
2.	Write individual historian memos describing file parameters which are not absolutely clear from the context <i>Example: A memo indicating that the 1st daily safety message was the one for 12 March and the last was for 24 Sept"</i>	<input type="checkbox"/>

Develop Document Database

The files custodian needs to build an electronic database that allows query by key words.

STEP	ACTION	✓
1.	Select a database APPLICATION that best suits the needs of marine safety and legal users	<input type="checkbox"/>
2.	Design a database with at least the following retrieval fields: <ul style="list-style-type: none"> • Date/DTG of document • From: Name/Originator/Job Title • To: Name/Originator/Job Title • Subject • Key Words • Notes • Doc Number • File location by drawer number <p>NOTE: Check with expected post response users for input on other fields needed</p>	<input type="checkbox"/>

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Comprehensive Archive (cont'd)

Develop Document Database (Cont'd)

The checklist for building an electronic database continues below.

STEP	ACTION	✓
3.	Determine whether each master file contains individual documents which a user might want to access individually	<input type="checkbox"/>
4.	Sequentially number, near the red Historian stamp, each document selected for inclusion in the database and enter the number into the database	<input type="checkbox"/>
5.	Enter the individual file name in the database for all files, including those that may need individual retrieval	<input type="checkbox"/>
6.	Maintain a master index list of the keywords used during the database entry process	<input type="checkbox"/>
7.	Print hard copy of database and copy database files to floppy disk(s)	<input type="checkbox"/>
8.	Write chronology of incident, footnoted by document numbers	<input type="checkbox"/>

Comprehensive Archive (cont'd)

FOIA Determinations

Complete the FOIA process.

STEP	ACTION	✓
1.	Archive and segregate documents that may be exempt from release under FOIA <i>Examples: Drafts, privacy act, attorney work product, proprietary</i>	<input type="checkbox"/>
2.	Review those selected with Servicing Legal Office	<input type="checkbox"/>
3.	Place non-releasable documents in their hanging files under a red canopy with a non-releasable cover sheet on the canopy	<input type="checkbox"/>
4.	Consolidate non-releasable documents in one area of a single drawer	<input type="checkbox"/>
5.	Complete all pending FOIA requests	<input type="checkbox"/>
6.	Microfilm releasable portion of the archive NOTE: This step requires technical documentation support	<input type="checkbox"/>

Write Archive Instruction

The custodian of the archive must write a unit instruction detailing how the archive is to be maintained.

STEP	ACTION	✓
1.	Appoint a custodian and an alternate custodian by letter	<input type="checkbox"/>
2.	Draft unit instruction regarding the use and maintenance of the archive. Include: prohibition on the use of stamped documents in the archive except for making working copies NOTE: ONLY the appointed custodian or alternate should make copies	<input type="checkbox"/>
3.	Develop a "road map" of the archive which details what documents are in the archive, where they are, and how they may interrelate NOTE: This is an enclosure to the archive instruction	<input type="checkbox"/>

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Comprehensive Archive (cont'd)

Write Archive Unit Instruction (cont'd)

Job aid continued from previous page.

STEP	ACTION	✓
4.	Coordinate with the regional National Archives and Records Administration (NARA) office regarding the direct accession of the files in 10 years, bypassing FRC process NOTE: This correspondence and the reply are enclosures to the archive instruction	<input type="checkbox"/>
5.	Include a copy of the Information Request Protocol, developed earlier, as an enclosure to the archive instruction	<input type="checkbox"/>
6.	Insert the archive instruction, signed by the FOSC, in the archives	<input type="checkbox"/>
7.	Place a COPY of the archive instruction, with enclosures, on the outside of the first cabinet containing the archives	<input type="checkbox"/>

Section/Unit Demobilized

Demobilization Tasks

Below are demobilization responsibilities applicable to all personnel assigned to this section/unit.

STEP	ACTION	✓
1.	Receive Demobilization Plan from Demobilization Unit Leader/Planning Section Chief	<input type="checkbox"/>
2.	Brief subordinates regarding demobilization	<input type="checkbox"/>
3.	Supervise demobilization of unit, including storage of supplies	<input type="checkbox"/>
4.	Provide Supply Unit Leader with a list of supplies to be replenished	<input type="checkbox"/>
5.	Forward all Section/Unit documentation to Documentation Unit	<input type="checkbox"/>
6.	Complete Check-out Sheet	<input type="checkbox"/>

Information Exchange Matrix

Information Exchange Matrix

Inputs/Outputs

Below is an input/output matrix to assist the Documentation Unit Leader in exchanging information with other ICS positions.

MEET With	WHEN	DUL OBTAINS	DUL PROVIDES
Incident Commander	Initial incident brief Command Staff meeting As needed	Initial expectations Guidance/support	Documentation Unit capabilities Briefings
Legal Officer	As needed	Incident coordination input to tasks	Briefings FOIA coordination On-site support
G-LCL	As needed	Incident coordination input to tasks Input for documentation goals vs. USDOJ	Briefings FOIA coordination On-site support
NFPC Case Officer	As needed	Incident coordination Input to tasks	Briefings On-site support
Support Agency Personnel	As needed	Documentation collection coordination	Documentation Unit (DU) needs Support coordination
NARA Regional Personnel	As needed	Archive accession coordination FRC bypass coordination	Incident explanation
State Historic Preservation Officer	As needed	Concerns about affect of response ops on historically significant sites	Incident explanation