



Section 4.C

Incident Review

4.C.1. Incident-Specific Preparedness Review

An Incident-Specific Preparedness Review (ISPR) occurs at the direction of Coast Guard Headquarters following the completion of the initial response phase of a specifically selected incident. Commandant (G-M), in consultation with the cognizant District Commander, determines when an incident and the ensuing response warrant the convening of an ISPR Team. It is anticipated that no more than four ISPRs will be convened during any given fiscal year.

4.C.1.a. General

The goal of the ISPR is to document a thorough assessment of the Coast Guard preparedness processes. This review will focus on the objective review of response actions undertaken following an incident compared to the planning assumptions in effect during the time of the occurrence. The primary mission of an ISPR team is not to grade or critically evaluate the actual response efforts undertaken, but instead, study the implementation and effectiveness of the ACP and its integration with vessel response plans, facility response plans and other relevant and applicable plans in effect at the federal, state, and local levels.

The ISPR does not, and shall not be relied upon to create any rights, privileges, duties or benefits, either substantive or procedural, enforceable at law by any person or entity in any administrative, civil, criminal, or other matter. An ISPR report is intended to identify strengths and weaknesses in the planning methodology to produce positive, effective preparedness improvements where determined to be appropriate.



ISPRs are not considered administrative investigation as defined by COMDTINST M5830.1 (Administrative Investigations Manual) although this document may be used as a general reference.

Except as determined by the chairman on the advice of the other members of the ISPR team, none of the deliberations of the ISPR team will be conducted in public. The availability of agency records, including notes or other documents, arising from the ISPR's work are subject to the applicability of the Freedom of Information Act, 5 U.S.C. 552(a), and Administration policy. All notes and other records generated by an ISPR team during the course of a review shall be submitted to Commandant (G-MOR) along with a copy of the report when completed. Commandant (G-MOR) shall maintain these records on file for one year from the date of submission.

All travel associated with an ISPR must be authorized by the ISPR chair. Commandant (G-MOR) provides accounting data and TONOs to Coast Guard members, who must submit properly documented travel claims through their local PERSRU and then submit copies of the processed travel voucher summaries to Commandant (G-MOR). State, industry, and other representatives invited to participate on an ISPR team will receive invitational orders. Commandant (G-MOR) is responsible for funding travel and lodging expenses. The Coast Guard will not compensate other representatives for their time spent on the review.

4.C.1.b. ISPR Team

(1) Formation

Upon determination that an ISPR will be convened, Commandant (G-M) will designate the members of the team in writing. An ISPR team will normally consist of a chairman, two to four additional team members and one recorder. Actual team membership will depend on the circumstances surrounding the specific incident under review. Given that the type of experience required by an ISPR team will vary from incident to incident, specific teams members will accordingly be



selected to reflect necessary experience. ISPR members shall include state and or industry representatives as appropriate. Industry representative will be selected from candidates compiled from responses received to federal register notices soliciting participation. Generally, members of an ISPR team will be selected from individuals not involved with the response to an incident.

(2) Responsibilities

An ISPR team shall examine the implementation and effectiveness of the ACP, as well as the ACP's integration with vessel or other appropriate plans. Therefore, information gathering efforts such as interviews of personnel, examination of available records, message traffic, and contingency plans will be necessary. Members of a team do not have federal subpoena authority, so voluntary cooperation of federal, state, and local agency employees and the public must be sought. Coast Guard personnel are required to fully cooperate with an ISPR team.

An ISPR team shall not interfere with any Coast Guard casualty investigation, National Transportation Safety Board investigation, or local board of inquiry which are being conducted separately. Furthermore, while an ISPR and its members have access to all publicly available information from such investigations or inquiries, the ISPR team will not have access to such information which is not publicly available. In addition, an ISPR team shall not identify fault, blame or violation of federal or state laws or regulations, or identify the cause of a casualty. If information or evidence of such violations are acquired during a review, they should be provided to the proper investigative body.

The ISPR member designated as recorder is responsible for:



- Assembling and providing documentary information required by the team (e.g., ACP, relevant State/Local Contingency Plans, Industry Response Plans, POLREPS/Correspondence, lab results, etc.)
- Coordinating travel, interview, meeting space, and report generating arrangements
- Assimilates teams work into final draft document for ISPR Chair's signature

4.C.1.c. ISPR Report

When the ISPR team has completed its review of the incident, the chair shall submit a final report to Commandant (G-M), with a copy to Commandant (G-MOR), the affected AREA and District (m), and the appropriate OSC within 3 months from the convening date. This report shall contain: an executive summary including the teams review process, identification of areas of focus, comments relating to the focus areas, and document lessons learned obtained from the review. If the reporting deadline cannot be met, the chairman shall submit a letter to Commandant (G-M) explaining the reasons for the delay along with the anticipated completion date. Specific lessons learned shall be reported using the PREP Lessons Learned System (PLLS) format identified in the PREP section of this Chapter.

An ISPR team may find it beneficial to review previous ISPRs for process, form, and content. ISPRs are expected to be clear and succinct reports such that readers may quickly ascertain the areas of focus relative to the incident, with lessons learned that will foster an improved future preparedness posture. Presently, a Standard After Action Reporting System (STAARS) is being developed as a COMDTINST 3010.19 (series) and designed to capture universal lessons learned across all program areas. The format of ISPRs will be required to incorporate lessons learned in accordance with such an instruction in the future.

As suggested from an actual ISPR, teams may find it useful to generate the following types of products as the review process is



initiated and conducted, as well as aiding with compilation of the final report:

- Event Chronology
- Point of Contacts List
- Focus Issue Areas
- Interview Guide (outline to ensure focus & comprehensiveness)
- Reference Document Bibliography