

United States Coast Guard
MARINE SAFETY MANUAL



Marine Environmental Protection
Volume IX
COMDTINST M16000.14



Chapter 4

Preparedness

NOTE

Preparedness is an iterative and dynamic process involving a cycle of contingency planning, training, exercising and evaluating.

A key Marine Safety mission, Preparedness is a process intended to ensure response capability and organization for prompt and effective response to discharges or substantial threat of discharges of oil and releases of hazardous substances, thereby minimizing the impacts. The Oil Pollution Act of 1990 (OPA) established Preparedness as a cornerstone of effective pollution response. Based on identified risks, response resource needs are identified, plans are developed and personnel are trained in their response roles. The plans are tested in exercises and real time pollution events, and are revised as appropriate, based on the lessons learned, thereby continuously improving preparedness. (See Sections 311 (c)(1) and 502(7) of the Clean Water Act).

Preparedness must be achieved at a variety of levels in the National Response System (NRS) for effective response. Local needs and capabilities must be coordinated effectively with those at the overlying levels. Incident reviews and evaluations of drills such as Preparedness for Response Exercise Program (PREP) exercises pay particular attention to the implementation of Area Contingency Plans (ACPs), Facility Response Plans (FRPs) and Vessel Response Plans (VRPs). PREP exercises help evaluate how well the plans were implemented and determine areas in which they can be improved.

Each turn of the planning, training, exercise and revision cycle serves to fine-tune Preparedness. Throughout this chapter, the reader should remain aware of the interrelationships of its sections and the need for feedback or lessons learned to be incorporated into the planning process.



Chapter 4

Preparedness

Section 4.A	Planning	4-1
4.A.1.	Federal Response Plan.....	4-1
4.A.2.	National Contingency Plan	4-3
4.A.2.a.	National Response Team (NRT).....	4-3
4.A.3.	International Agreements and Joint Contingency Plans	4-3
4.A.4.	RRTs and Regional Contingency Plans	4-4
4.A.4.a.	Regional Response Team.....	4-5
4.A.5.	Area Contingency Plan.....	4-6
4.A.5.a.	Area Committee/Area Committee Responsibilities	4-7
4.A.5.b.	Area Contingency Plans.....	4-10
4.A.6.	Facility Response Plans, Vessel Response Plans, and Shipboard Emergency Response Plans	4-15
4.A.6.a.	General	4-15
4.A.6.b.	Facility Response Plan (FRP) Receipt and Review	4-16
4.A.6.c.	One-plan/Integrated Contingency Plans	4-21
4.A.6.d.	Vessel Response Plan Review (VRP).....	4-22
4.A.6.e.	Shipboard Oil Pollution Emergency Plans (SOPEP).....	4-23
4.A.6.f.	Waivers and Alternative Means of Compliance	4-24
4.A.6.g.	One Time Port Visit Not Covered by an Approved Response Plan	4-26
4.A.6.h.	Facility Response Plan Enforcement Policy.....	4-26
4.A.6.i.	Vessel Response Plan Enforcement Policy	4-28



U.S. Coast Guard Marine Safety Manual, Vol. IX
Chapter 4 - Preparedness - Table of Contents

4.A.6.j.	Shipboard Oil Pollution Emergency Plans Enforcement Policy.....	4-30
4.A.6.k.	Captain of the Port Orders.....	4-31
4.A.6.l.	Oil Spill Removal Organization (OSRO).....	4-32
4.A.7.	Spills of National Significance (SONS).....	4-33
4.A.7.a.	Spills of National Significance Protocol	4-34
4.A.8.	District Response Group (DRG)/District Response Advisory Team (DRAT)	4-34
4.A.8.a.	District Response Group	4-34
4.A.8.b.	District Response Advisory Team (DRAT).....	4-36
4.A.9.	Database Support.....	4-37
4.A.9.a.	General	4-37
4.A.9.b.	SPEARS as a Planning Tool.....	4-38
Section 4.B	Exercises	4-39
4.B.1.	Preparedness for Response Exercise Program (PREP).....	4-39
4.B.2.	Credit for PREP Exercises	4-40
4.B.2.a.	External Exercise Credit.....	4-40
4.B.2.b.	Government-Initiated Unannounced Exercise Credit.....	4-41
4.B.2.c.	Internal Exercise Credit.....	4-41
4.B.3.	Area Exercises	4-42
4.B.3.a.	Government-Led Area Exercises	4-42
4.B.3.b.	Industry-Led Exercises.....	4-50
4.B.3.c.	Internal PREP Exercises.....	4-51
4.B.3.d.	Government-Initiated Unannounced Exercises.....	4-51
4.B.4.	Exercise Review.....	4-53



Section 4.C	Incident Review.....	4-54
4.C.1.	Incident-Specific Preparedness Review.....	4-54
4.C.1.a.	General	4-54
4.C.1.b.	ISPR Team.....	4-55
4.C.1.c.	ISPR Report.....	4-57
Section 4.D	Training & Education Programs.....	4-59
4.D.1.	Marine Environmental Protection Industry Training (MEPIT)	4-59
4.D.1.a.	MEPIT Program	4-59
4.D.1.b.	Applicant Background.....	4-60
4.D.1.c.	Internship	4-60
4.D.2.	Direct Commission Environmental Manager (DCEM)	4-61
4.D.2.a.	Participants	4-61
4.D.2.b.	Eligibility Requirements.....	4-61
4.D.3.	Environmental Management Post Graduate Training	4-63
Appendix 4-A	Recommended Procedures for Conducting Comprehensive Reviews of Facility Response Plans	4-A-1



Section 4.B

Exercises

4.B.1. Preparedness for Response Exercise Program (PREP)

The cornerstones of the OPA 90 legislation focused on prevention, preparedness, and response. The response plans required by industry, as well as government, are designed to prepare for an incident and, in the event of an oil spill, ensure the response is conducted to minimize damage to public health and the environment. To ensure these response plans and Area Contingency Plans (ACPs) will be executed well during an actual oil spill, OPA 90 and response plan regulations require that they are exercised. To that end, the Preparedness for Response Exercise Program (PREP) was developed.

PREP was developed to provide a mechanism for compliance with the exercise requirements, while being economically feasible for the government and oil industry to adopt and sustain. The PREP is a unified federal effort and satisfies the exercise requirements of the Coast Guard, the Environmental Protection Agency (EPA), the Research and Special Programs Administration (RSPA), Office of Pipeline Safety (OPS), and the Minerals Management Service (MMS).

In August 1994, the PREP Guidelines were published. These guidelines are a culmination of more than one and one-half years of workshops with federal, state, and local government agencies and private companies, as well as other interested parties. The Guidelines outline the frequency and types of exercises a plan holder should conduct to meet the exercise requirements of the appropriate response plan regulations.

The types of exercises are divided into two categories: internal and external. The internal exercises are:

- quarterly Qualified Individual notification exercises;



- quarterly Emergency Procedures exercises for vessels and barges;
- annual Emergency Procedures exercises for facilities (optional);
- annual Spill Management Team tabletop exercises;
- semi-annual Equipment Deployment exercises for facility-owned equipment, and
- annual Equipment Deployment exercises for OSRO or CO-OP equipment.

All internal exercises are self-evaluated and self-certified.

The external exercises are:

- Area exercises; and
- Government-initiated unannounced exercises.

This manual will not duplicate the information in the PREP Guidelines. It is intended to supplement the information about Area exercises and what may be needed to conduct the exercise.

4.B.2. Credit for PREP Exercises

The PREP Guidelines describe how plan holders can take credit for internal exercises when they respond to an actual incident. The Guidelines also describe how the National Scheduling Coordinating Committee (NSCC) will give credit to industry and government when they request credit for an actual spill response.

4.B.2.a. External Exercise Credit

When a government or industry requests credit for an actual spill response, the plan holder needs to evaluate the response in terms of the PREP objectives. Generally, a Joint Evaluation Report will be written by representatives from primary agencies responding to the spill, i.e., Coast Guard, industry, and State. The report will be written in the lessons learned format consistent with the other government-led exercises. If an Incident Specific Preparedness Review report is written for the oil spill, then this report can be submitted in lieu of the Joint Evaluation Report.



4.B.2.b. Government-Initiated Unannounced Exercise Credit

As discussed in the PREP Guidelines, the Government-Initiated Unannounced Exercises are designed to give the Coast Guard an opportunity to evaluate, on a random basis, their Area's response preparedness. There may be situations when the industry plan holder wants to use the Government-Initiated Unannounced Exercise to meet the requirements for internal exercises (i.e., internal unannounced spill management team tabletop exercise). Because these Government-Initiated Unannounced Exercises are used by the COTP to determine industry preparedness, to take internal exercise credit, an industry plan holder must request approval from the COTP.

At the completion of the exercise, the plan holder must formally request the COTP to allow them to take credit for an internal exercise. The industry participant should demonstrate that the objectives of the internal exercise are similar to the objectives of the external exercise and that the exercise was evaluated internally. Where problems were encountered, the response plan will be amended.

The COTP can decide to allow the industry participant to take credit if, in the opinion of the COTP, the plan holder performed well during the exercise. If the COTP believes that the plan holder exercised in good faith and will amend the response plan based on the results of the Government-Initiated Unannounced Exercise, as well as the internal exercise, then the COTP should allow the plan holder to take credit.

4.B.2.c. Internal Exercise Credit

Although the internal exercises are self-evaluated and self-certified, questions may arise regarding what is considered an appropriate exercise and should receive credit for an internal exercise.

The question has been raised with respect to Spill Management Team (SMT) Tabletop exercises, especially when the SMT is not within the plan holders corporation. Although the exercise is called SMT Tabletop exercise, the plan holder is the entity that takes credit for the exercise. The intent of the exercise is to ensure the SMT can integrate into the plan holders organizational structure. This exercise requirement ensures familiarity with sources, sizes,



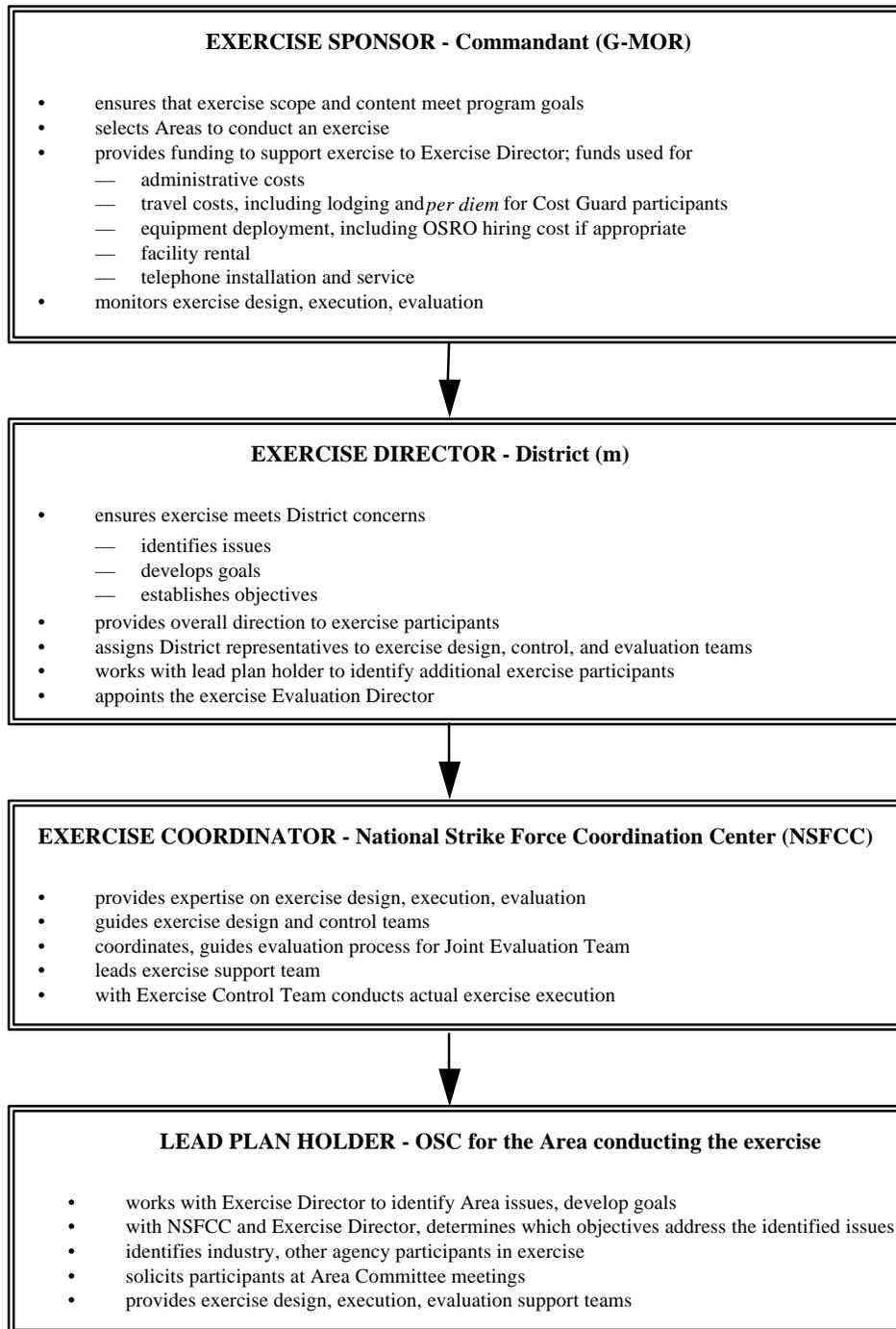
and locations of potential spill scenarios they will be responsible for managing. For the exercise to be effective, the members from the plan holders organization participating in the exercise, must be the decision-makers during an incident. The plan holder must be actively engaged in the decision-making process during the exercise. For foreign plan holders, the Coast Guard encourages the plan holders participate in person at the exercise, but understanding the economic burden of this requirement, the plan holder should participate via telephone if that is the manner they would engage during an actual spill.

4.B.3. Area Exercises

The following describes how to plan an area exercise. The differences between government and industry-led exercises are the roles filled by the lead plan holder. The steps to developing an exercise are: planning, execution, and evaluation. The complexity of the planning and execution is dependent on the exercise Director and the design team. The evaluation phase will vary very little between exercises.

4.B.3.a. Government-Led Area Exercises

All PREP exercise participants have roles and responsibilities; **Figure 4-3** below details these responsibilities. Where an office changes title or does not exist, a functional equivalent should execute the role.



PREP Roles and Responsibilities
Figure 4-3



Although the Exercise Director and design team establish the exercise's size and scope, the exercise usually lasts 8 to 12 hours. An exercise should challenge as many of the 15 core components (listed in **Figure 4-4**) as possible. Although the PREP guidelines require equipment deployment, it is an optional function during an Area Exercise.

1. Notification	6. Containment	12. Personnel Support
2. Staff Mobilization	7. Recovery	13. Equipment Maintenance and Support
3. Operate within Management System	8. Protection	14. Procurement
4. Discharge Control	9. Disposal	15. Documentation
5. Assessment	10. Communications	
	11. Transportation	

PREP Core Components
Figure 4-4

(1) Planning

Generally three meetings are sufficient to plan a one-day (8 to 12 hours) exercise, though more may be necessary for very complex exercises. NSFCC develops and maintains the meeting and exercise schedule; if a conflict arises, the Exercise Director or Lead Plan Holder should notify the Exercise Sponsor and NSFCC as soon as possible to resolve any issues.

- Before the first meeting:
 - District (m) representatives work with the OSC and Area representatives to determine which exercise objectives of the 15 core components will be challenged, and
 - the Exercise Director and Lead Plan Holder contact all the potential exercise players including industry participants.
- The first meeting is the Coordinators' Consult where NSFCC meets with the players and design team participants. The exercise scenario design requires at least two meetings—initial and final—and perhaps more for complex, lengthy exercises.



Exercise Planners can use SPEARS to develop PREP scenarios in a number of different ways. SPEARS can be used to identify the following types of information:

- location to conduct an Area Exercise or simulate an event for a Spill Management Tabletop Exercise;
 - types of oil transported into and away from a location, and;
 - locations where a high frequency of incidents occur.
- During the second and third meeting, the design team decides on the scenario, primary and secondary players, controllers, evaluators, and the exercise inputs (actions). During government-led exercises, very little is simulated. If an agency or company wants to include their highest corporate office in the play, then they have to participate fully. The role of media and the public (citizens) is usually simulated. At this time, the Evaluation Director is appointed to head the Joint Evaluation Team.

(2) Exercise Execution

The NSFCC and Exercise Control Team manage the actual exercise execution.

- The Team's primary participants are Area response infrastructure members, controllers, evaluators or data collectors.
 - These members may be selected from the District (m), NSFCC, National Pollution Funds Center (NPFC), the DRGs, OSC's staff, state(s), Regional Response Team members, Area Committee members, industry participants, and others as appropriate. Headquarters planning personnel and G-MOR also may perform these functions on the exercise if necessary.



The most viable way to ensure consistency among data collectors is to use the District PREP Coordinators as a core group of exercise controllers. There are some distinct advantages to this approach. The District PREP Coordinators possess program knowledge, familiarity with Coast Guard issues, and can most effectively and consistently collect data with minimal training requirements. Additionally, using the District PREP Coordinators will improve overall knowledge of exercises for the Coast Guard, increase exposure to lessons learned and dissemination to District and units, which, in turn should create greater uniformity in exercise control.

- The NSFCC will conduct the briefing and training for controllers, evaluators, and data collectors for their responsibilities in the exercise.

(3) Exercise Evaluation

- The NSFCC coordinates the exercise evaluation process, working closely with the Evaluation Team leader and the Joint Evaluation Team. The Joint Evaluation team is composed of representatives from the Federal, state, and industry players. The NSFCC will assist District (m) or the Evaluation Director in preparing the Joint Evaluation Team Report. The Joint Evaluation Team report includes, but is not limited to, a description of the scenario, the objectives chosen for evaluation, observations, lessons learned, and recommendations.

G-O-2 will assist the Evaluation Team when developing the lessons learned. Data collectors focus on the response *process*, including:

- the effectiveness of government/industry interaction,
- the practicality of the Area Contingency Plan and the industry response plan, and
- how conduct during the exercise relates to what was planned to happen.



Lessons Learned Format and Procedures

A lesson learned describes a better way of accomplishing a task or overcoming a problem. It should describe: (1) a successful action that should be noted for future reference; (2) a problem encountered that has service-wide significance, and the positive action the participants took to bypass or alleviate that problem; or (3) a problem that was encountered for which no solution was found.

For the PREP to be effective, lessons learned must be submitted for all government-led PREP exercises. Even if the information appears to be relevant only to the submitting Joint Evaluation Team, it may prove beneficial when shared with others.

Each lesson learned must stand alone (i.e., it must make sense without reference to any other lesson learned in the database or to any other document). Paragraphs should be written so that they can be understood and properly interpreted by someone not involved with the exercise. All acronyms and abbreviations must be spelled out the first time they are used in each lesson learned report.

The following describes the type of information for each category listed in the lessons learned format.

- (1) Paragraph 1 contains the unique PLLS Number which is automatically assigned by the PLLS software and used to identify the report. Next list the name of the organization preparing the report, then the name of the individual who will serve as the point of contact for the report.
- (2) Paragraph 2 contains the type and nickname of the exercise and the exercise director. For PREP exercises, the type of exercise may be Area or Spill Management Team Tabletop Exercise. The exercise director depends on the responsible person. For example, the exercise director for a Government-led Area Exercise is the District representative.
- (3) Paragraph 3 is where the "KEYWORDS" are listed. Keywords should be specific to the lesson learned and sufficient in number to allow retrieval of the record when it is part of the database.



- (4) Paragraph 4 is the “TITLE” of the lesson learned. It should reflect both the subject area and the nature of the lesson learned. This data field allows up to 75 characters which should be typed in upper and lower case letters.
- (5) Paragraph 5 is the “OBSERVATION”. This block should contain a brief factual statement of the observed success or problem. This statement can be: (1) positive, or about procedures used that should be advertised or shared; or (2) negative, something that happened that was not supposed to occur or something that did not occur, but should have. Each lesson learned should be limited to a single observation.
- (6) Paragraph 6 is the “DISCUSSION”, in which better describes or clarifies the success or problem described in the observation statement by answering the “who, what, where, when, why, and how” questions.
- (7) Paragraph 7 is the “LESSON LEARNED” or on-site adjustment. This paragraph contains: (1) a statement of the positive action, if any, taken to generate success; or (2) a statement of the action that should have been taken to avoid or alleviate the problem. Enter the word “none” if no solution or work around was identified.
- (8) Paragraph 8 is the “RECOMMENDED ACTION”, in which a statement of how to repeat the success or permanently correct the problem, and who should make the correction.

The recommendation could result in a requirement for new or modified publications, procuring new equipment, revising contingency plans or industry response plans, etc. This should not be a restatement of paragraph 7.

- (9) Paragraph 9 is the “COMMENTS” section where additional pertinent information by any participant is included.



PLLS LONG REPORT FORMAT	
1.	PLLS NUMBER:* _____, submitted by _____
2.	TYPE** conducted by _____ on _____ mm/dd/yy
3.	KEYWORDS:
4.	TITLE:
5.	OBSERVATION:
6.	DISCUSSION:
7.	LESSONS LEARNED:
8.	RECOMMENDED ACTION:
9.	COMMENTS:
—	SUBJECT:
—	INTEROPERABILITY:
*	PLLS Number is automatically assigned by the software when a new record is created.
**	TYPE refers to type of exercise conducted (i.e., SMT)

Figure 4-5

A few weeks after the evaluation team drafts the Joints Evaluation Report, the NSFCC completes report. Then submits it to the District (m) and COTP for review. The COTP forwards the report to District (m). District (m) sends the final version to G-MOR. G-MOR then has the report put into the PREP Lessons Learned System (PLLS) computer database.

PLLS is available on an electronic bulletin board, 703-313-5910, or Internet at <http://www.navcen.uscg.mil/prep/prep.htm>.



4.B.3.b. Industry-Led Exercises

There are approximately 11 industry-led exercises held annually; the OSC and staff shall participate in all phases of exercise design, execution, and evaluation. The industry and District (m) are responsible for ensuring that the exercise occurs as scheduled. In accordance with the VRP and FRP regulations, the OSC may direct an industry to lead an industry-led exercise.

- (1) If industry representatives notify the National Scheduling Coordinating Committee that they want to participate in an exercise, the NSCC forwards this notification to District (m), which with the OSC's staff decides whether to include the industry and calls the NSCC, which then adds the industry to the schedule. If the industry notifies the COTP about participating in an exercise, the OSC's staff notifies District (m) and G-MOR whether they want that industry; G-MOR adds the industry representative to the schedule.
- (2) The industry lead plan holder:
 - is the Exercise Sponsor,
 - names the Exercise Director and Design Team, and
 - designs, develops, and executes the industry-led exercise.
- (3) The Coast Guard will play an active role in coordinating with the industry during the exercise design phase to ensure that the Area response mechanism is adequately challenged.
- (4) If Coast Guard resources are available, District (m) may authorize their participation in unscheduled industry exercises, which may be credited as an Area exercise.

A Joint Evaluation Report should also be written for industry-led exercises. The industry lead should provide the evaluation director and the report should be written in the same format as the lessons learned report format for Government-led exercises. Once the report is completed, District (m) may forward it to G-MOR for inclusion into the PLLS database.



4.B.3.c. Internal PREP Exercises

Three exercises test different portions of the Area Contingency Plan (ACP). **Figure 4-6** provides a summary of these exercises. District (m) is the Exercise Sponsor and the OSC is Exercise Director. If resources are available, District Planning and the appropriate Strike Team provide assistance, the latter particularly for equipment deployment.

Exercise	Tests
Quarterly Notification	Test communications among critical members of the Unified Command during initial response
Annual Spill Management Tabletop (SMT TTX)	Government participation within the ACP-identified Unified Command System; OSCs should encourage state and industry participation
Equipment Deployment	Deployment of Coast Guard-owned first aid and prepositioned equipment

Internal PREP Exercises
Figure 4-6

- (1) Several sources of assistance are available for those who wish to hold exercises.
 - The NSFCC has information available to assist in exercise development, execution, and evaluation.
 - Marine Safety School at RTC Yorktown has designed a model exercise to walk an Area spill management team through its responsibilities to further refine interaction and improve the Unified Command System.

4.B.3.d. Government-Initiated Unannounced Exercises

When determining preparedness, the Government-Initiated Unannounced Exercises are a useful tool to the COTP. The development of the scenario is flexible enough so that the COTP can



determine if the plan holder can implement all parts of the response plan. For example, if the COTP believes there is a discrepancy between the information in a response plan and the capabilities of the referenced co-op or Oil Spill Removal Organization (OSRO), then the COTP can use an unannounced exercise to highlight the issue and the plan holder can make corrections to accurately reflect the capabilities. Unannounced exercises conducted to date have been successful in highlighting problems in the industry response plans and, in turn, better preparing the area for a spill.

As discussed in the PREP Guidelines, the Government-Initiated Unannounced Exercises are designed to give the agency with primary regulatory responsibility for an industry the opportunity to evaluate, on a random basis, their response preparedness. For Coast Guard-regulated vessels and facilities, there are several issues to be considered.

- The exercises are limited to four per area per year.
- The exercise is limited to 4 hours in duration.
- A plan holder, directed to participate in a Government-Initiated Unannounced Exercise, is required to participate.
- The exercise scenario involves a response of an average most probable discharge scenario, if deploying equipment; however, the scenario can involve a larger quantity if no equipment is deployed.
- The PREP Guidelines state that equipment deployment is involved in the exercise. However, unannounced exercises have been conducted where equipment deployment was simulated. Whether equipment is deployed depends on the objectives of the COTP.

When conducting an unannounced exercise, the cost is borne by the industry plan holder. For this reason, the length of the exercise should not exceed 4 hours. The COTP should insure that the exercise objectives are met and the plan holder is well prepared to respond to an oil spill.

When an exercise is conducted, the industry plan holder is not required to participate in another Federal Government-Initiated Unannounced Exercise for at least 36 months.



The plan holder must maintain documentation of this participation for three years. The documentation should be available to the Coast Guard upon request.

There may be situations when the industry plan holder wants to use the Government-Initiated Unannounced exercise to meet the requirements for internal exercises (i.e., internal unannounced spill management team tabletop exercise). Because these Government-Initiated Unannounced Exercises are used by the COTP to determine industry preparedness, to take internal exercise credit, an industry plan holder must request approval from the COTP.

At the completion of the exercise, the plan holder must formally request the COTP to allow them to take credit for an internal exercise. The industry participant should demonstrate that the objectives of the internal exercise are similar to the objectives of the external exercise and that the exercise was evaluated internally. Where problems were encountered, the response plan will be amended.

The COTP can decide to allow the industry participant to take credit if, in the opinion of the COTP, the plan holder performed well during the exercise. If the COTP believes that the plan holder exercised in good faith and will amend the response plan based on the results of the Government-Initiated Unannounced Exercise, as well as the internal exercise, then the COTP should allow the plan holder to take credit.

4.B.4. Exercise Review

The exercise evaluation process focuses on plan feedback, identifying the plan's strengths and weaknesses, and how well the plan works and coordinates its various elements. Evaluation results are lessons learned that the Coast Guard and industry can apply nationwide to improve plan quality, the planning process, and participant response to a pollution incident. We do not know what the overall results are, but hope that as a result of exercises, there will be reductions in the threat of illness, improved survival of wildlife and environment, costs saved, and general improvement in quality of life.



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.