

AHIMTA IIMTQS Position Task Book Comment Form	
First Name:	Please save file as: AHIMTA_Comments_FirstName_LastName_YYYYMMDD.xlsx
Last Name:	Email completed comment form to: AHIMTA@AHIMTA.ORG
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Submital Date:	DO NOT ALTER THE STRUCTURE OF THIS FORM.

\* **Category Definitions:**  
**Critical:** Refers to significant content issue that should be addressed (i.e., content would cause conflicts, flaws, confusion, and/or voids when implemented)  
**Substantive:** Refers to factually incorrect information  
**Administrative:** Refers to typographical, grammatical, or formatting errors; vague or unclear meaning

**Comments and Resolution/Action**

Position Task Book (e.g., RESL)	Page #	Task #	Category *	Comment	Recommendation/Proposed Language	A = Agree C = Conditional/Partial Agreement D = Disagree
DIVS	13	17	SUBSTANTIVE	... briefing from Branch Director, Operations Section Chief or Incident Commander	... briefing from supervisor and do away with all the titles	A Change to recommended wording.
DIVS	15	26	Substantive	add bullet to consider Safety Assistant if the criticality determines the need		A Add bullet: Evaluate the need for an Assistant Safety Officer assigned to Division/Group
DIVS	16	39	Substantive		simplify by provide briefing to supervisor, do away with the titles	D No Change. Branch Director and Operations Section Chief are the supervisors when following ICS guidelines.
Planning	18	10	definition	Do not understand the Logs only comment -seems like planning units also have this responsibility	delete LOGS ONLY comment	C Change bullet to read: "Determine EOC or other support" Delete (LOGS ONLY)
Planning	19	17	substantive	Recognize any special medical needs	Why not delete medical and just say special needs? <b>Apply to all PTBs</b>	C Replace with bullet "Recognize any specific medical or other special needs of all unit personnel." Remove bullet 7 which is a duplicate of bullet 6.
Planning	23	37	substantive	... outgoing Incident Management Team (IMT)	may not be a team ratehr just incident or initial action personnel	D Disagree - It is part of an "example" and task includes wording that recognizes the host agency and is open to other organizational structures.
Planning	25	52	substantive	Organization chart/list	Seems redundant with content of IAP since the 203 is a requirement, the 207 may be depending on agency	C This comment refers to Task 51. Change bullet to read "Organization List, ICS 203 and 207 if needed"
Planning	27	58	clarity	... for approval and signature	Seems to me that an approval requires a signature why show both?	C Change bullet to read: "for approval signature" (omit "and")
Planning	27	59/60	substantive	Seems like task 59 and 60 need to come in front of completing the IAP in item 58		A Reorder task per suggestion.
Planning	30	69	substantive	This talks about the distribution on the final Demob plan yet items 71 & 72 on the next page deal with development of the Plan. Seems to be a bit backwards.		D No Change: These task are under different behaviors and are not suggesting the order the task are to be performed.
Planning	33	77	substantive	...requirements of the Agency Admin.	I would stick with the verbage of AHJ to remain consistent	D No Change: The representative of the entity (AHJ) the IMT is working for is represented by the Agency Administrator, therefore the AA requirements are those of the AHJ.
TFLD	12	6	substantive	Ensure qualifications of personnel.	Good thought but almost an impossible mission - does the TFLD check red cards? Call the AHJ for verification? Provide an objective test??	C Change bullet to read: "Ensure qualifications of personnel are appropriate for the unit's objective." In the All-Hazards enviornment there may or may not be a "red card" for a specific discipline, e.g., law enforcement personnel for an objective requiring advanced emergency medical skills.
TFLD	13	13	substantive	other support (LOGS ONLY)	Not sure why this is LOGS ONLY	C Change bullet to read: "Determine EOC or other support" Delete (LOGS ONLY)
TFLD	13	18	substantive	Apply the ICS	Pretty vague statement that will be hard to evaluate and measure on the incident. Might be better to say something about work within the established organizational structure.	C Change Task to read: "Adhere to ICS principles".
TFLD	15	26		...tasks to resources	Would provide more clarity to assign tasks and resources...	D No Change: Complete text of Task is clear. The TFLD is directing the assigned resources to perform specific task.
TFLD	17	34	substantive	Attend operational briefings and meetings...	Participate in operational briefings and meetings... <b>Apply to all PTBs</b>	A Change "Attend" to "Participate".
TFLD	18	40	substantive	Only listed 214, how about Performance eval?	<b>Apply to all PTBs</b>	A Add bullet: "Performance evaluations"
Logistics	22	19	definition	appears vague and hard to understdn the intent	Ensure subordinates have the ability to clearly understand and give instructions	D Do not agree. His comment does not meet the intent of the task.
Logistics	22	20	clarity	Vague and too wordy	Develop units' schedule/assignments	C Change: "or relevant plan"
Logistics	22	21	clarity	wordy	Not necessary to complete daily reiew - may need to do more than once daily DELETE daily <b>Apply to all PTBs</b>	C Accept in principal- reword "Review of units staffing requirements" add bullet Ensure adequate personnel Add possessive apostrophe on "unit's staffing requirements."
Logistics	28	54	critical	add possible mobile laundry services		A Add bullet: "Mobile laundry service"
Logistics	42	114	critical	reviewed and signed by Safety Officer.	think the SOFR needs to approve, not just sign the ICS-206	D Leave as written. The ICS 206 just indicates "Safety Officer", implying that s/he approves when signing.
Logistics	45	131	critical	Nothing indicated to be proactive in the ordering and supply of equipment that may be needed in future operational periods		C Change bullet: "Proactive ordering of personnel for subsequent operational periods"
RESL	24	TBD	Critical	Competency does not address creation of check-in plan, establishing check-in locations and time, or ability to dynamically manage resources by kind and type	1. Add "Accountability & Resource Management" competency section to include: <b>Accountability:</b> Create process to gather accountability for planned event or no-notice incident a. Work with Operations to determine most efficient check-in process for incident/event (e.g., remote check-in locations, supervisor level accountability, etc.) - <b>I1</b> or <b>O1</b> b. Write check-in plan that includes location(s), process, and credentialing requirements - <b>I1</b> or <b>O1</b> c. Establish personnel accountability report (PAR) schedule for duration of incident/event - <b>I1</b> or <b>O1</b> <b>Resource Management:</b> a. Determine need for unique resource kind and type identifiers (e.g., numerics for different localities or incident/event specific resources) - <b>I1</b> or <b>O1</b> b. Demonstrate ability to dynamically meet Operational resource needs (e.g., create STs or TFs using unassigned resources) - <b>I1</b> or <b>O1</b>	C Add Bullet: 1. Establish check-in locations 2. Demonstrate ability to meet operational resource needs (e.g. create STs and TFs using unassigned resources)
TFLD & DIVS		FINAL EVALUATOR'S VERIFICATION	Administrative	these are different than the unit leader PTBs	use the unit leader PTBs formatting <b>Apply to all PTBs</b>	A Insure all PTBs use same final evaluator format
TFLD	13	13	Administrative	First Bullet Wording is unclear	Reword	C Change bullet to read: "Determine EOC or other support" Delete (LOGS ONLY)
TFLD	17	39	Substantive	The TFLD may not be the one facilitating the AAR	Change Conduct to Participate <b>Apply to all PTBs</b>	D No Change: TFLD should be able to conduct an AAR with their resources.
DIVS	13	16	Administrative	First Bullet Wording is unclear	Reword	C Change bullet to read: "Determine EOC or other support" Delete (LOGS ONLY)
Planning Unit Leaders	18	10	Administrative	First Bullet Wording is unclear	Reword	C Change bullet to read: "Determine EOC or other support" Delete (LOGS ONLY)
Planning Unit Leaders	21	26	Administrative	This is a unit leader PTB and a unit leader would not be responsible for conducting a section AAR	Change Conduct to Participate	C Change "Section" to "Unit"

Planning Unit Leaders	21	26	Administrative	This is two different tasks	Split into to tasks	A	Agree, separate into 2 task
Planning Unit Leaders	21	29	Administrative	final incident package does not correctly identify the final product	Reword "incident final package"	D	Does not change meaning
Logistics Unit Leaders	20	10	Administrative	First Bullet Wording is unclear	Reword	C	Change bullet to read: "Determine EOC or other support" Delete (LOGS ONLY)
Logistics Unit Leaders	23	26	Administrative	This is two different tasks	Split into to tasks	?	Agree, separate into 2 task
Logistics Unit Leaders	23	26	Administrative	This is a unit leader PTB and a unit leader would not be responsible for conducting a section AAR	Change Conduct to Participate		Change "Section" to "Unit"
Logistics Unit Leaders	23	29	Administrative	final incident package does not correctly identify the final product	Reword "incident final package"	A	Does not change meaning
Finance Unit Leaders	18	10	Administrative	First Bullet Wording is unclear	Reword	C	Change bullet to read: "Determine EOC or other support" Delete (LOGS ONLY)
Finance Unit Leaders	21	26	Administrative	This is two different tasks	Split into to tasks		Agree, separate into 2 task
Finance Unit Leaders	21	26	Administrative	This is a unit leader PTB and a unit leader would not be responsible for conducting a section AAR	Change Conduct to Participate		Change "Section" to "Unit"
Finance Unit Leaders	21	29	Administrative	final incident package does not correctly identify the final product	Reword "incident final package"	A	Does not change meaning
Finance Unit Leaders	24	47	Administrative	hostincident	Typo	A	Change to "host incident"
Finance Unit Leaders	31	92	Administrative	AHJ has not been used	change to Host Agency	A	Change to "Host Agency"
All PTB			Administrative	This is to be consistent with previous published PTBs	Add dark borders to all headers.	A	Agree professional formatting needed but no change at this time.
All PTB			Administrative	This is to be consistent with previous published PTBs	Format all task & codes with same spacing above the task	A	Agree professional formatting needed but no change at this time.
All PTB		Evaluators Page	Administrative	This is to be consistent with previous published PTBs	Switch Evaluator recommendations #2 and #3 & indent second line of each recommendation	A	Previously published PTBs evaluation records will be changed to new version of evaluation record.
Generic Language	11	3rd paragraph	Critical	what is "in a classroom simulation"?	delete "in a classroom simulation" and add "on events"	C	Change to: "...incidents, simulation/tabletop exercise, planned events, in training...."
Generic Language	11	Item 2 Bullet 6	Critical	add who the signature is from	a signature recommending certification from the AHJ agency head	C	Change to "obtaining the appropriate signature recommending certification"
Generic Language	11	Item 2 Bullet 7	Critical	I thought the qualification (credential) was coming from the State, not their Department.	Submit the PTB to the appropriate individual for review by the QRC.	C	Change bullet to: "Retain the .... appropriate individual for review by the SQRC. (refer to current edition of the IIMTQS Guide)
Generic Language	12	Item 3 New Bullet	Critical	Add the following after bullet 5 to help clarify the evaluators role when they read this page, since these are the instructions.	Evaluate the numbered tasks only. Do not evaluate bullets, they are provided as examples or additional clarification.	A	Add bullet: Evaluate the numbered tasks only. Do not evaluate bullets, they are provided as examples or additional clarification
Generic Language	12	Item 4 Bullet 3	Administrative	Listing page numbers can cause problems if something is added to the front of the PTB.	delete the page numbers and insert "statement found in the front of the PTB"	A	Remove "found on pages 4 to 7" and add "statement found in the front of the PTB"
Generic Language	12	Item 4 Bullet 4	Critical	Conflict between IIMTQS and PTB. In the IIMTQS it states the if the "trainee has not completed the final evaluation, the task book may be extended at the description of the training officer for up to three years." (Page 32/33 Step 2). In the PTB it says the Final Evaluator is "Ensuring all tasks have been completed within the three years prior to submission for final approval. Any task with an approval older than three years must be reevaluated and brought up to date." Why give the Training Officer the authority to extend the PTB if the Final Evaluator is going to reject any task over three years old?	Add some language such as "unless the PTB has been extended by the Training Officer"	C	Change bullet: Delete "Any task with an approval older than three years .... up to date." Extensions are addressed in the current version of the IIMTQS Guide.
Generic Language	12	Item 5	Administrative	It would be easier for those working with the PTB to find the information in the order of how the PTB is completed from start to finish.	Make the "Training Officer" information number 2 on the list.	A	Move Training Officer to No. 2
Generic Language	12	Item 6	Critical	"AHJ Designee" the duties are almost identical to the "Training Officer." Also, this position is not defined in the IIMTQS.	Remove "AHJ Designee" from the PTB and move any duties the AHJ Designee and assign those additional duties to the Training Officer.	C	Change Item 6 to: Incident Training Specialist. Add to bullet 1: "...with concurrence of employing/sponsoring organization. Replace remaining bullets with the following bullets to agree with IIMTQS Guide: 2. Identify incident evaluation opportunities. 3. Assist trainees, coaches/trainers and evaluators with proper documentation. 4. Conduct progress reviews and answer questions. 5. Ensure that coach/trainer and evaluators are qualified and can make accurate and honest appraisal of the trainee's performance.
Generic Language	13	1st Paragraph	Administrative	Don't have a date that will need to be updated every time FEMA updates the version.	Change to: for specific positions set by the latest version of ICS competencies and behaviors recognized by FEMA's National"	A	Change to: for specific positions set by the latest version of ICS competencies and behaviors recognized by FEMA's National...."
Generic Language	13	1st Paragraph	Critical	Bad web address for NIMS Resource Center	In trying to figure out if this paragraph is needed. I could not find the NIMS Resource Center only the ICS Resource Center at: training.fema.gov/emweb/is/icsresource/ Clicking on the ICS Position Checklist box I located eight March 15, 2007 PTBs and February 10, 2012, Position Checklists for 30 ICS positions. So I guess the paragraph is needed but the site information needs to be updated.	A	Update site address to: <a href="http://www.fema.gov/media-library/assets/documents/11685">http://www.fema.gov/media-library/assets/documents/11685</a>
RESL	24	TBD	Critical	Competency does not address creation of check-in plan, establishing check-in locations and time, or ability to dynamically manage resources by kind and type	1. Add "Accountability & Resource Management" competency section to include: <i>Accountability:</i> Create process to gather accountability for planned event or no-notice incident a. Work with Operations to determine most efficient check-in process for incident/event (e.g., remote check-in locations, supervisor level accountability, etc.) - <b>I1</b> or <b>O1</b> b. Write check-in plan that includes location(s), process, and credentialing requirements - <b>I1</b> or <b>O1</b> c. Establish personnel accountability report (PAR) schedule for duration of incident/event - <b>I1</b> or <b>O1</b> <i>Resource Management:</i> a. Determine need for unique resource kind and type identifiers (e.g., numerics for different localities or incident/event specific resources) - <b>I1</b> or <b>O1</b> b. Demonstrate ability to dynamically meet Operational resource needs (e.g., create STs or TFs using unassigned resources) - <b>I1</b> or <b>O1</b>	?	Add Bullets: 1. Establish check-in locations 2. Demonstrate ability to meet operational resource needs (e.g. create STs and TFs using unassigned resources)
All				I do not believe that a competency entry for a subordinate position in the PTB will adequately prepare a person for the expectations of an incident of any complexity. For example a supply unit leader who did not fully understand the complexities of the job of an ordering manager would not, in my opinion, be competent in their position on a complex assignment. This extends to the other positions outlined for direct entry.	Recommend that the association reconsider the direct entry proposal for plans, logistics and finance and require the subordinate positions.	C	AHIMTA recognizes the current state of development of incident management teams across the nation and the need to build capacity for the nation. The AHIMTA IIMTQS Guide and associated Position Descriptions (PDs) and Position Task Books (PTB's) are minimum standards established to meet this need. Experience, historical recognition, and direct entry requirements vary by position based on national engagement with subject matter experts and practitioners. Under Direct Entry, the competency and key task of the subordinate positions have been incorporated in the Direct Entry PTB and must be satisfactorily demonstrated to become qualified.  We acknowledge the value of continuing to reevaluate experience requirements, incident complexity and all standards as an ongoing part of developing AHIMTs as well as subsequent revisions of our documents. Ultimately there will be a time when the Direct Entry program should sunset.

			<p>This comment applies to all the Unit Leader PTB's but most specifically to the Division Supervisor and Task Force Leader Positions. I do not believe (based on 23 years of Type 1 C&amp;G experience -15 as an ICT1) you can effectively operate on an incident without prior Incident experience. Page 16 in the IIMTQS recommends that one assignment must be on an incident, however as the Guide is just that-a Guide- states could lower that requirement to no incident experience. The draft Guide gives the impression that any of the Codes would be sufficient to demonstrate a Behavior and potentially not require an incident assignment. Operations and Safety positions especially should require multiple incident assignments. There are operational positions, such as, DIVS that should require more than 2 assignments given the critical nature of that position. There are serious life safety considerations to a position task book completed in the safety of an exercise.</p>	<p>Require incident experience within in all position task books as a requirement for a state to adopt the IIMTQS.</p>	<p>?</p> <p>The IIMTQS Guide establishes the minimum standards and does require a minimum of one incident. Perhaps this point should be made clearer in the next revision of the Guide. Given the lack of available incident and training opportunities nationwide there is little opportunity for people in many non-wildfire disciplines to get quality experience. As with all task book qualification systems, the IIMTQS relies heavily on the evaluators' judgment to determine an individual's qualifications. (Read above comment.)</p>
			<p>In reading the UL PTB's in conjunction with IIMTQS I have the impression that the AHIMTA is creating Type 3 UL positions. Page 64 of IIMTQS states "for many Type 3 positions-direct entry is allowed and goes on to describe the process to do this with the UL PTB's. It is my understanding that there is no Typing for UL or any other position other than C&amp;G in same. Additionally the positions listed in the Guide RESL-AH imply some other type of position or qualification. An RESL is an RESL no matter what the complexity or type of assignment. The duties and tasks are the same. When I order a UL I expect them to be competent to work on any incident I do not want to be surprised that a UL was trained and experienced at a complexity level that does not exist.</p>	<p>Insure that the Guide and the PTB's are congruent in their expectations on the complexity levels the individuals are expected to operate at.</p>	<p>?</p> <p>It is not the intention of the AHIMTA IIMTQS to add typing to unit leader positions. This wording will be corrected in the next revision of the Guide. The use of AH after the mnemonic was agreed by AHIMTA as the format. This should and likely be removed at a future date. Again, there is limited opportunity for trainees to gain experience on high complexity incidents and we have to rely on the judgment of the evaluators (Read two prior comments).</p>
			<p>I do not believe that a competency entry for a subordinate position in the PTB will adequately prepare a person for the expectations of an incident of any complexity. For example a supply unit leader who did not fully understand the complexities of the job of an ordering manager would not, in my opinion, be competent in their position on a complex assignment. This extends to the other positions outlined for direct entry.</p>	<p>Recommend that the association reconsider the direct entry proposal for plans, logistics and finance and require the subordinate positions.</p>	<p>See row 65</p>
All			<p>This comment applies to all the Unit Leader PTB's but most specifically to the Division Supervisor and Task Force Leader Positions. I do not believe (based on 23 years of Type 1 C&amp;G experience -15 as an ICT1) you can effectively operate on an incident without prior Incident experience. Page 16 in the IIMTQS recommends that one assignment must be on an incident, however as the Guide is just that-a Guide- states could lower that requirement to no incident experience. The draft Guide gives the impression that any of the Codes would be sufficient to demonstrate a Behavior and potentially not require an incident assignment. Operations and Safety positions especially should require multiple incident assignments. There are operational positions, such as, DIVS that should require more than 2 assignments given the critical nature of that position. There are serious life safety considerations to a position task book completed in the safety of an exercise.</p>	<p>Require incident experience within in all position task books as a requirement for a state to adopt the IIMTQS.</p>	<p>See row 66</p>
			<p>In reading the UL PTB's in conjunction with IIMTQS I have the impression that the AHIMTA is creating Type 3 UL positions. Page 64 of IIMTQS states "for many Type 3 positions-direct entry is allowed" and goes on to describe the process to do this with the UL PTB's. It is my understanding that there is no Typing for UL or any other position other than C&amp;G in same. Additionally the positions listed in the Guide RESL-AH imply some other type of position or qualification. An RESL is an RESL no matter what the complexity or type of assignment. The duties and tasks are the same. When I order a UL I expect them to be competent to work on any incident I do not want to be surprised that a UL was trained and experienced at a complexity level that does not exist.</p>	<p>Insure that the Guide and the PTB's are congruent in their expectations on the complexity levels the individuals are expected to operate at.</p>	<p>See row 67</p>