



## FAQ – Training Requirements in Proposed Spill Management Team Certification Regulations, 14 CCR § 830.1- 830.11

### 1. Which training courses are required for certification?

The training requirements for spill management teams are tiered, based on the reasonable worst-case spill volumes listed in contingency plans for which spill management services are provided (see subsection 830.3(c) for descriptions of the tiers). A complete spill management team includes both initial and cascading response personnel. Training requirements for initial response personnel are team-based, and requirements for cascading response personnel are position-based.

#### *Initial Response Personnel*

Initial response personnel are team members who can arrive on-scene within 8 hours of notification to fill the incident command system (ICS) positions of Incident Commander, Safety Officer, and Operations Section Chief (see subsection 830.4(a)).

Training requirements for initial response personnel are team-based. Depending on tier, between one and four team members are required to have each training. The trainings include IS-100, IS-200, IS-700, IS-800, and ICS-300. Additionally, initial response personnel receive eight hours of ICS refresher training each year. See subsections 830.5(e) through (h) for full details on initial response personnel training requirements. A summary table is also posted on OSPR's SMT [web site](#).

#### *Cascading Response Personnel*

Cascading response personnel can arrive on-scene within 24 hours to fill additional command and general staff positions (Incident Commander, Safety Officer, Public Information Officer, Liaison Officer, Operations Section Chief, Planning Section Chief, Logistics Section Chief, and Planning Section Chief; see subsection 830.4(a)).

The training requirements for cascading response personnel include ICS-300 and its prerequisites, as well as experience filling their positions at an exercise or equivalent experience in a response. Cascading response personnel on Tier I and II teams are required to have position-specific training, and all cascading response personnel receive eight hours of ICS refresher training each year. See subsections 830.5(i) through (l) for full details on cascading response personnel training requirements. A summary table is also posted on OSPR's SMT [web site](#).

Note that initial and cascading response personnel need not be exclusive; teams may rely on the same personnel to meet the requirements, provided the personnel meet the appropriate on-scene arrival and training criteria (sections 830.4 and 830.5). Plan holders with reasonable worst-case spill volumes in the Tier III range that only pose

potential impacts to intermittent or ephemeral streams are not required to include cascading response personnel on their teams (subsection 830.4(a)(3)(E)).

## **2. What is ICS refresher training?**

Refresher training can be any meaningful engagement with ICS principles, processes, forms, or position duties, and it is included as a requirement to ensure that team members maintain a baseline level of familiarity with ICS. Participation in exercises and training courses can count toward the required hours, and refresher training also be tied to other plan holder requirements, such as quarterly notification drills or equipment deployments. The regulations are flexible regarding how refresher training may be achieved, and teams are encouraged to be creative.

## **3. Which types of courses will be accepted to fulfill the training requirements?**

The training course standards are based on the National Incident Management System (NIMS) training program. The regulations reference the United States Coast Guard (USCG) and the Federal Emergency Management Agency (FEMA) curricula, but they allow for spill management teams to take equivalent courses through non-agency training vendors. The regulations define equivalent courses as meeting the same learning objectives over the same number of hours as the USCG or FEMA curricula (section 830.5(a)(1)). Equivalent courses for the position-specific courses required of Tier I and II cascading response personnel must be led by an instructor, whether conducted virtually or in person (section 830.5(a)(2)).

## **4. Do the regulations allow for on-the-job experience to substitute for the required training courses?**

Experience performing incident command system positions in emergency responses may be substituted for the required training courses. The regulations allow both for experience that may substitute for all of the required training courses, and for a lesser amount of experience that can substitute for the required exercise participation only. For each cascading response position and tier, equivalent experience is quantified as the number of hours spent performing the lead or deputy/assistant position in emergency responses of various complexities, as outlined in the incident typing scale in the USCG's Incident Management Handbook. Note that incidents are not required to have been formally typed by an agency to be referenced; teams can apply types to incidents using the characteristics included in the typing scale. Experience in responses to emergencies other than oil spills may be cited as qualifying experience, and responses outside of California may be included. See sections 830.5(j) through (l) for full details on qualifying experience. A summary table is also posted on OSPR's SMT web site.

## **5. Has OSPR made any adjustments to the regulations to account for challenges posed by Covid-19?**

OSPR has made substantial adjustments to the time frames for compliance from the pre-Covid draft of the regulations. The rulemaking was delayed by several months, pushing back the anticipated effective date of the regulations from January 1, 2021, to

October 1, 2021. The deadline for teams with an interim certification to earn a full certification was extended from the end of the third calendar year to the end of the third *full* calendar year following the effective date (see section 830.7(c) for interim certification details). This provides an additional year for teams to obtain full certification, extending the deadline from the end of 2023 to the end of 2024.

In addition, the training grace period was extended from 18 months to the end of the third full year following an interim certification to give teams ample time to arrange for safe delivery of training courses. This extension more than doubles the time allowed for teams to receive the required training compared to timelines included in earlier drafts of the regulations. Additionally, it streamlines the process for teams working up to a full certification by imposing a single deadline for teams to achieve both training and exercise objectives required.