


Policy Title:	Emergency Communications and Public Notification		
	OFFICE OF THE CHIEF ADMINISTRATIVE OFFICER	Category	Public Affairs
		Administrative Policy #	
		Revision #	
		Review Frequency	As Needed – no less than triennially
Administrative Division	Public Affairs Division	Reviewed By	Public Affairs, General Counsel
BOWC Approval		Last Reviewed/Update Date	
Implementation Date			

1. AUTHORITY

- 1.1. The policies and procedures set forth are in accordance with Michigan administrative rules R325.10401 through R 325.10409 promulgated under the Safe Drinking Water Act 1976 PA 399, as amended, MCL 325.1001 *et seq.* and the Federal Public Notification Rule, Title 40 of the Code of Federal Regulations 141.201 *et. seq.* promulgated under the Federal Safe Drinking Water Act, Public Law 93-523, as amended 42 USC 300f *et. seq.*

2. OBJECTIVES

- 2.1. Establish guidelines and internal controls to ensure and provide an effective process for notifying the appropriate personnel and agencies and promoting effective communications during an emergency.

3. PURPOSE

- 3.1. The purpose of this policy and procedure is to ensure timely notifications to the appropriate executive and leadership staff during a water or sewer emergency and streamline ongoing communications through the duration of the incident and to ensure the release of synchronized public messaging between Detroit Water & Sewerage Department, the City of Detroit and, as needed, Great Lakes Water Authority.

4. DEFINITIONS

“DWSD” stands for Detroit Water and Sewerage Department.

“GLWA” stands for Great Lakes Water Authority.

“BOWC” Board of Water Commissioners.

“Emergency Alert System (EAS)” is a public alert and warning system that leverages the communications assets of EAS participants to allow the President of the United States the capability to address the American public during a national emergency.

“Employee” means a person hired and currently employed by DWSD including all contract workers.

“EOC” stands for Emergency Operations Center.

“Fusion Center” is an intelligence gathering, analysis and dissemination center, operated by the Great Lakes Water Authority to monitor all City-owned and/or Great Lakes Water Authority (GLWA) leased facilities. The Fusion Center is located in the Water Board Building, 735 Randolph Street, Detroit, Michigan.

“The Joint Information Center” means the area in the Emergency Operations Center that is specifically designated for media operations.

“NIXLE” means a zip-code based alert system using text messaging for residents that have voluntarily opted-in.

“ReadyOp” means a web-based platform that enables DWSD Public Affairs to send a message to specific groups (i.e., City Council, public safety officials, school leaders and facility managers, hospitals) via email, text and voice.

“Timely manner” means within a timeframe that allows DWSD and appropriate Detroit City Departments to review and issue notification to the public in an expedient manner and within the federally and state required timeframes.

“Wireless Emergency Alerts (WEA)” means a mobile alert system which sends an alert to cell phones located within the City of Detroit boundaries.

5. SCOPE

- 5.1. This policy and procedure applies to all DWSD employees and all situations in which emergency communications are deemed necessary, including low, medium and high priority.

6. RESPONSIBILITIES

- 6.1. DWSD is responsible for the efficient and effective communications of emergency situations to other DWSD employees, BOWC, key GLWA contacts, Fusion Center, key City contacts, and all other necessary parties given the nature of the situation at hand.
- 6.2. DWSD Public Affairs Director is responsible for managing the operations of communications to ensure the proper parties are being informed with the proper information at the proper times.
- 6.3. GLWA will notify the Michigan Department of Environmental Quality (MDEQ) of necessary updates at GLWA’s discretion.
- 6.4. GLWA shall provide DWSD information in a timely manner so that DWSD may draft the public notices that must be issued due to occurrences that originate at the treatment facilities or functions operated by GLWA.

7. POLICY

7.1. Locations for Emergency Operations

- 7.1.1. During an emergency that does not require collaboration with external parties, DWSD will manage incidents from the administrative offices or internally-designated location, such as the Fusion Center.
- 7.1.2. If the severity of the emergency is widespread and threatens public health and safety, and requires the response coordination of multiple City departments and agencies, the Mayor will be consulted to determine whether to partially or fully activate the Detroit Emergency Operations Center (EOC) (a full activation calls in the Mayor, executive staff, department directors, and department representatives to report to the EOC).

7.2. Emergency Communication

- 7.2.1. Internal communications with relevant stakeholders, as well as messages disseminated to the public, shall be timely, accurate, trustworthy and responsive to the concerns of the impacted population. DWSD shall express concern/sympathy for individuals impacted by the crisis in order to mitigate reputational damage and display DWSD's value and care for the customer. DWSD shall also provide a response promptly after the crisis occurs.
- 7.2.2. Whenever possible, DWSD employees, the BOWC, and City Council should receive information prior to hearing about the event from the media.
- 7.2.3. For non-life threatening incidents involving DWSD assets, facilities, properties or safety, employees may call the Fusion Center, whose employees will contact appropriate first responders and personnel.
- 7.2.4. Information sent to key contacts should be confirmed or acknowledged to eliminate assumptions that any delivered message has automatically been received. When necessary, the EOC's Joint Information Center will be activated to coordinate media communications and ensure synchronized public messaging.
- 7.2.5. Public mass notifications may include the NIXLE emergency alert notification system, Wireless Emergency Alerts (WEA) to cell phones users in Detroit, and the Emergency Alert System (EAS) that interrupts television and radio broadcasts. DWSD shall communicate with the appropriate City departments to facilitate the distribution of communications through these channels.

7.3. GLWA collaboration

- 7.3.1. DWSD shall notify and collaborate with GLWA as necessary.

7.4. Public Notification

- 7.4.1. In compliance with MDEQ, all public notices shall contain at minimum the following information:
 - a) Description of the violation or situation
 - b) When the violation or situation occurred or will occur
 - c) Potential health effects
 - d) The population at risk
 - e) Should alternative water supplies be used
 - f) Actions consumers should take
 - g) Actions DWSD is taking to correct the violation or situation
 - h) When the system expects to return to compliance
 - i) Contact information

- j) Required distribution language
- 7.4.2. In compliance with MDEQ and the Environmental Protection Agency (EPA) regulation, DWSD shall originate and issue public notifications to customers or issue public notifications to customers on behalf of GLWA, when:
 - a) Exceedances of maximum levels (MCLs) or maximum residual disinfectant levels (MRDLs).
 - b) Violations of treatment techniques.
 - c) Monitoring and testing procedure violations.
 - d) Failure to comply with the schedule of a variance or exemption.
 - e) Occurrence of waterborne disease outbreak or other waterborne emergency. As required by the MDEQ, this includes:
 - 7.4.2.e.1. E. coli bacteria detected in the distribution system
 - 7.4.2.e.2. E. coli bacteria detected in the source water
 - 7.4.2.e.3. Loss of pressure in the distribution system (total coliform bacteria not detected but boil advisory issued as a precaution)
 - 7.4.2.e.4. Total coliform bacteria detected
 - f) Ground Water Rule fecal indicator-positive source samples.
 - g) Exceedance of the nitrate MCL in non-community systems that have been granted permission by the MDEQ to continue to exceed the nitrate MCL of 10 milligrams per liter
 - h) Exceedance of the secondary maximum contaminant level (SMCL) for fluoride
 - i) Operation under a variance or exception
 - j) Availability of unregulated contaminant monitoring results
- 7.4.3. Public notifications shall be displayed in a conspicuous way, not contain overly technical language or very small print, not be formatted in a way that defeats the purpose of the notice, and not contain language which nullifies the purpose of the notice.
- 7.4.4. Public notifications shall follow the Tier 1-3 timelines set forth in the EPA regulation.

7.5. The use of emergency alert systems

- 7.5.1. Emergency alerts shall only be activities when immediate action is required, in a significant emergency or dangerous situation that threatens the public safety, life, or security. DWSD shall confirm the existence of a significant emergency or dangerous situation before originating an emergency alert message.

8. PROCEDURE

8.1. Communication preparation

- 8.1.1. DWSD Public Affairs Division will draft crisis message templates to ensure prompt communication. Pre-drafted crisis message templates may include statements by top

management, news releases, cable news crawls, and social media messages. DWSD, the City of Detroit, and, as needed, GLWA will collaborate prior to the release of public messages to ensure consistent messaging.

8.2. Communication methods

8.2.1. Various means of communicating information about the incident or emergency to the media and the public include, but is not limited to, social media, news releases, City cable news crawl, GovDelivery, and TV & radio. Updated information, which may include bulleted fact sheets of City department activities in response to the incident, as well as an incident website blog or scroll with timestamped updates on the incident, may serve to keep the media and public informed of mitigation efforts.

8.2.2. Key mechanisms for disseminating information internally include ReadyOp, GovDelivery, phone, text, and email chains.

8.2.2.a.1. The ReadyOp notification system will be used to simultaneously notify the appropriate parties, including City Council, of an incident and to provide brief messaging.

8.2.2.a.2. The Public Affairs Division will create an email chain to regularly update leadership, including the BOWC and those identified on a need-to-know basis to maintain situational awareness throughout the crisis.

8.2.3. All emergency alert messages shall:

- a) Establish the urgency, severity, and certainty of the situation prior to activating an emergency alert
- b) Keep emergency alert messages clear and simple
- c) Inform the public clearly about the nature of the emergency
- d) Identify the geographic area(s) the emergency message for which applies
- e) Identify the duration of the alert message
- f) Inform on specific actions authorities are taking in response to the emergency
- g) Provide incremental alerts, as new and critical information is available
- h) Identify appropriate means of contacting DWSD for more information

8.3. Priority Levels

8.3.1. A water/sewer incident can be gauged by its level of severity, which will also determine the span of notifications. An incident can begin as a Low Priority Alert and escalate to a more complex situation, at which time the notification and communications span will broaden.

8.4. Low Priority Alerts

8.4.1. If the incident initiates with DWSD, notifications will proceed as follows:

- a) DWSD Director, Deputy Director, Chief Administrative Officer and/or Public Affairs Division will notify the BOWC, Office of the Mayor and its communication staff, Neighborhoods Group Executive, Department of

Neighborhoods General Manager, Health Department Director, and Health Department Public Information Officer.

- b) DWSD Director, Deputy Director, Chief Administrative Officer and/or Public Affairs Division will notify the City Council contacts, including the City Council President, City Council Members At-Large, and the Council Member in the affected area (and residents in the affected area, if appropriate).

8.4.2. If the incident initiates with GLWA, GLWA will initiate contact with DWSD and DWSD will continue contact with the individuals listed above.

8.5. Medium Priority Alerts

8.5.1. If the water emergency is categorized or escalates to a Medium Priority Alert, the following steps will be added to those already being done in the case of a Low Priority Alert:

- a) The DWSD Public Affairs Director or designee will perform the following functions. The order of operations may vary based on the discretion of the DWSD Public Affairs Director or designee.

8.5.1.a.1. Send out ReadyOp notifications

8.5.1.a.2. Send notification to the DWSD Chief Administrative Officer

8.5.1.a.3. Collaborate with Mayor's Office and GLWA as needed to synchronize public message

8.5.1.a.4. Send periodic email updates to key executives and personnel regarding incident as guided by the emergency notification tree.

8.5.1.a.5. Send notification to DWSD employees

8.5.1.a.6. Send notification and updates to DWSD affected customers

8.5.1.a.7. Maintain website and social media updates

8.5.1.a.8. Identify if additional emergency alert systems should be activated (i.e. NIXLE, WEA, and/or EAS)

8.5.1.a.9. Send media releases and/or updates through determined best communication medium

8.6. High Priority Alerts

8.6.1. If the water emergency is categorized or escalates to a High Priority Alert, the following steps will be added to those already being done in the case of a Medium Priority Alert:

- a) The DWSD Director, Deputy Director, and/or Public Affairs Division will perform the following functions. The order of the operations and contacts may vary based upon the discretion of DSWD. Notifications will be sent to:

8.6.1.a.1. All City Council Members

8.6.1.a.2. Hospital Emergency Managers, Security Directors, and Public Information Officers

8.6.1.a.3. Region 2 South Healthcare Coalition and Public Information Officers

- 8.6.1.a.4. Key City Department Directors (i.e. Health, Police, Fire, Homeland Security, and Emergency Management, and the Public Health Emergency Preparedness Coordinator)
- 8.6.1.a.5. All Public, Private and Charter School Principals or CEOs and Public Information Officers
- 8.6.1.a.6. Detroit Police and Fire Public Safety Communications and Public Information Officers
- 8.6.1.a.7. Wayne County Executive and Public Information Officers
- 8.6.1.a.8. Utility Providers, if deemed necessary (i.e. DTE)
- b) DWSD will contact Homeland Security who will collaborate with DWSD to activate EOC, and if required, notify DSEMIIC Intel Analyst and Michigan State Police Region 2 South District Coordinator.

Exhibit A: Emergency Notification Tree

CONFIDENTIAL INTERNAL DOCUMENT: Priority Notification Alerts for Water Incidents and Emergencies

