

TRUST INFRASTRUCTURE FRAMEWORK · CRISIS COMMUNICATIONS

Crisis Communications Plan — AFN-Inclusive, FCC- and ADA-Compliant

Client: City of San José, California · **Role:** Subcontractor · **Status:** Completed

C-MIST

AFN framework applied to full Crisis Comms Annex

FCC / ADA

Federal accessibility compliance achieved

UASI JIS

Bay Area regional JIS alignment completed

EPIO

Pre-scripted templates and activation checklists delivered

TRUST INFRASTRUCTURE

SAN JOSÉ, CA

CRISIS COMMUNICATIONS

LOCAL GOVERNMENT

AFN · C-MIST · JIS · FCC / ADA

The Situation

San José is the 10th-largest city in the United States and among the most linguistically diverse. Spanish, Vietnamese, Tagalog, Mandarin – and dozens more. When an emergency happens in San José, official crisis communications have to reach all of them. That's not a translation problem. It's a planning problem.

The city's Crisis Communications Annex had a structural gap: it hadn't been built around C-MIST (the Access and Functional Needs framework that accounts for Communication, Maintaining Health, Independence, Safety, Self-Determination, and Transportation). It also wasn't fully aligned with Bay Area UASI Joint Information System standards or federal FCC and ADA accessibility requirements. Crisis communications that only reach part of the population aren't crisis communications – they're communications for some people, with the rest left to figure it out.

What We Did

TLR used the C-MIST framework as the organizing structure for the Crisis Communications Annex – embedding AFN planning throughout rather than treating it as a supplement. C-MIST ensures that the full range of resident needs (communication barriers, health maintenance requirements, independence constraints, safety vulnerabilities, self-determination, and transportation access) are built into how communications are designed and distributed, not assessed after the fact.

We developed pre-scripted EPIO (Emergency Public Information Officer) message templates for multiple hazard scenarios – ready-to-use language that activation staff can deploy under pressure without improvising from scratch. Accompanying EPIO checklists structured the activation sequence, so the communications function runs consistently whether it's a senior EPIO or a backup staff member running the desk.

The annex was then realigned with Bay Area UASI JIS standards – ensuring San José's crisis communications would integrate with the regional joint information system rather than operating in isolation – and brought into compliance with FCC accessibility requirements and ADA obligations.

"Communications that don't reach everyone aren't communications. They're communications for some people, with the rest left on their own."

ENGAGEMENT DETAILS

Client	City of San José, CA
TLR Role	Subcontractor
Sector	Local Government
Status	Completed

KEY STANDARDS MET

AFN Framework	C-MIST
Accessibility	FCC + ADA
Regional JIS	Bay Area UASI
EPIO Tools	Templates + Checklists

POPULATION CONTEXT

10th-largest U.S. city · Multi-lingual · Significant AFN population · Bay Area regional integration

KEY DELIVERABLES

Annex	Crisis Communications (C-MIST)
Templates	Pre-scripted EPIO messages
Checklists	EPIO activation sequence
Compliance	FCC + ADA + UASI JIS

What We Delivered

- **Crisis Communications Annex** – fully updated with C-MIST AFN integration throughout, not appended as a section
- **Pre-scripted EPIO message templates** – hazard-specific, ready-to-use language for activation staff
- **EPIO activation checklists** – structured sequence for crisis communications operations during activations
- **FCC and ADA compliance** – federal accessibility requirements documented and met
- **Bay Area UASI JIS alignment** – annex integrated with regional Joint Information System standards

What Changed

San José's crisis communications infrastructure now reflects the city's actual composition. EPIO staff have pre-scripted templates to deploy during activations – tested language that doesn't require improvisation under stress. AFN considerations are built into the plan's structure, not footnoted at the end.

The annex meets federal accessibility standards and integrates with the Bay Area's broader emergency communications framework. When the next event triggers a JIS activation in the region, San José is connected to it – not operating its own parallel system. That's what interoperability actually requires: consistent standards built before you need them.

TRUST INFRASTRUCTURE FRAMEWORK · APPLIED

If your communications work only for people without disabilities or with limited English — they don't work.

TLR's Trust Infrastructure framework includes Communication Infrastructure as a core domain: the channels, protocols, and accessibility mechanisms that determine whether official guidance reaches the full population. C-MIST is the systematic approach that prevents AFN populations from becoming a planning afterthought. FCC and ADA compliance closes the legal gap. UASI JIS alignment closes the operational one. Together, they're what it actually means to build communications infrastructure – not just communications capacity for the population that's easiest to reach. In a city as diverse as San José, that distinction is the difference between crisis communications and crisis communications that work.