In October 2011, the NWCG-chartered Incident Management Organization Succession Planning Team (IMOSPT) provided recommendations for addressing sustainability issues with the current model of wildland fire succession planning and response. The NWCG subsequently chartered the Evolving Incident Management (EIM) project team to develop implementation plans for the IMOSPT recommendations. In July 2014, the Fire Management Board requested that NWCG address specific concerns about the EIM project. The NWCG tasked the EIM project team to address these concerns.

The EIM project team has addressed the specific concerns and developed an updated case for change, revised recommendations, and a proposed implementation schedule. Their report is attached. The NWCG Executive Board supports the recommendations. However, we recognize that this is an interim solution, as the recommendations do not fully address the issues identified by the IMOSPT. The most significant issues continue to be barriers to IMT participation and workforce succession, both of which are largely under the purview of the individual member agencies. This is identified in the EIM project team’s report.

The National Association of State Foresters and the International Association of Fire Chiefs have expressed concerns similar to those of the FMB to the NWCG Executive Board. We will keep them apprised of and seek their support for these developments.

Please let us know if you support the EIM project team’s revised recommendations. If so, we will work with the EIM project team on the proposed implementation plans. We will also continue to seek solutions to the long term sustainability issues identified in the original IMOSPT report.

Attachments
- Response to NWCG Tasking Memo M-14-08 Fire Management Board direction for Evolving Incident Management via NWCG EIM Project
- EIM Alternative Comparison Matrix
- ICAP Agency Employee Snapshot
- ICAP National Data Charts
- IMT Use By Agency
- FEC Memorandum to FMB RE: Evolving Incident Management
- NWCG Tasking Memo M-14-08 Fire Management Board Direction for Evolving Incident Management via NWCG EIM Project
To: Dan Smith, Chair, National Wildfire Coordinating Group

From: Evans Kuo, Project Lead, Evolving Incident Management

Subject: Response to NWCG Tasking Memo M-14-08 Fire Management Board Direction for Evolving Incident Management via NWCG EIM Project

Issue: The June 26, 2014 NWCG Tasking Memo M-14-08 tasked the Evolving Incident Management (EIM) Task Team to assist with the development of a report and analysis to:

- Update the EIM case for change.
- Provide recommendations for addressing identified problems and issues.
- Provide high level schedule for implementing those recommendations.

The purpose of this memo is to outline the methodology and analysis the EIM Task Team used to respond to the questions posed by the Fire Executive Council (FEC) in their May 30, 2014 memo to Fire Management Board (FMB). The FEC memo directed the FMB to conduct a review of EIM to validate the case for change, to consider if there are any new insights or changes that should be considered, and provide recommendations for addressing identified problems and concerns. The FEC memo also indicated support for activities that address the workforce management problems and efforts should be continued as these problems have existed since the late 1990’s. However activities that foreclose management options need to be suspended in 2014 in order to preserve the prerogative of the affected agency leadership to make final decisions.

FMB has tasked the NWCG Executive Board who in turn has tasked the EIM Task Team to assist with the report and analysis.

Background: The original case for change established by the Incident Management Organization Succession Planning Team (IMOSPT) identified numerous issues with sustaining our current model of incident management teams (IMT). Most of the issues and concerns identified in the Evolving Incident Management (EIM) 2011 Report are not new issues. Similar issues and concerns were identified in reports dating back to the Forest Service’s 2000 Agency Strategy for Fire Management Report (aka Jacob’s Report), the 2004 National Interagency Complex Incident Management Organization Study, the 2005 NIMO Feasibility report, the 2006 Quadrennial Fire and Fuel Report, the 2009 Quadrennial Fire Review, and the 2008 OIG audit of the Forest Service’s Firefighting Succession. All of these reports identified similar concerns with increasing wildfire complexity, increased duration of fire seasons, and concern over the ability to sustain IMTs under the current business model. Key points of these reports include:

- Significant cultural and demographic changes to the workforce which has led to decline in fire suppression participation.
- Reduction in overall size of federal workforce.
- Aging workforce and the average age is increasing.
- Functional allegiances creating chasms. Difficulty in maintaining allegiances to IMT as well home unit responsibilities.
- Role of militia with expectation of service is unclear.
- The long duration absence of current IMT participants from local units adversely impacts achievement of agency core missions and/or resource management targets.
Evolving Incident Management

Incident Management Teams (IMT) have grown in size to meet the demands of managing increasing numbers of firefighting resources in complex political and social settings.

Greater demand for incident management capacity on non-wildland fire all-hazard incidents such as hurricanes or floods.

By January 2010, most wildland fire management organizations -- federal, tribal, state, and local -- recognized they faced a significant number of retirements over the next ten years. Combining this information with the knowledge that our current workforce management and wildfire response succession planning was not sustainable given current and expected workload, the NWCG agencies initiated the Incident Management Organization Succession Planning (IMOSP) effort to conduct an assessment and analyze the current incident management business model. The IMOSP effort culminated in the November 2011 report: Evolving Incident Management, A Recommendation for the Future.

The objectives behind EIM are to:

- Create and implement a strategy to ensure that interagency Incident Management Team staffing needs are met.
- Establish and maintain a qualified workforce to meet wildfire staffing needs.
- Increase oversight and accountability for IMT management by agencies and geographic areas.
- Manage IMTs to actively support NWCG and agency goals for workforce succession, employee development, and workforce diversity.
- Be compliant with National Incident Management System (NIMS) as mandated by HSPD-5.

Since February 2014 implementation of EIM has been the subject of many discussions among agency leaders at the national and geographic area coordinating group levels. In May 2014 NWCG received a formal memo from the National Association of State Foresters (NASF) identifying their concerns with some of the EIM recommendations but support for efforts that addressed workforce development, creating efficiencies for how IMTs are managed, and increasing capacity to support IMTs. In July 2014 a similar memo was received from the International Association of Fire Chiefs (IAFC) mirroring NASF’s concerns. The items identified by NASF and IAFC are closely aligned with the concerns expressed by Forest Service leadership. The Department of Interior (DOI) Office of Wildland Fire (OWF) leadership has also concurred with the Forest Service, NASF, and IAFC’s assessments of the situation. These new insights prompted the FEC May 30, 2014 memorandum directing FMB to validate the original IMOSP case for change and develop new recommendations to address identified problems and concerns.

New Insights and Changed Conditions

In the early part of 2014 feedback began filtering in from the Geographic Area Coordinating Group (GACG) and other stakeholders. The surge of feedback was likely the result of EIM being the subject of numerous GACG-AC and stakeholder meetings after a two year hiatus between the time the original IMOSP team submitted their final report and when the EIM Phase 3 Task Team began providing more specific information on what the individual EIM recommendations entailed and how they would be implemented.

In the fall of 2013 the EIM Task Team released the results of an analysis outlining a proposal to reduce the number of IMTs across all GACG and requested formal feedback. The feedback received from many of the Geographic Area Coordinating Group Advisory Councils (GACG-AC), Forest Service Senior Fire Leadership Council (SFLC), DOI-OWF, NASF, IAFC, as well as comments from numerous stakeholders revealed a great deal of outright skepticism and very little support for the reduction in IMT numbers. The feedback also called into question several other key recommendations, however there is good
support for the EIM recommendations that address workforce succession concerns, re-evaluating development pathways for Command and General Staff qualifications, and ways to increase support for IMT participation.

In April 2014 the EIM Task Team conducted a strategic assessment of all the EIM recommendations, and identified the key recommendations receiving the majority of the negative feedback as well as the recommendations that had good support. The assessment was recorded in the April 16, 2014 entry of the EIM Key Decision Log (http://www.nwcg.gov/imosp/eim_key_decision_log.pdf).

The three original EIM recommendations receiving the majority of negative feedback are:

1. All IMTs will be qualified at the Type 1 level.
2. Goal of creating 40 National IMTs. Some GA’s are prepared to scale down to the recommended number, but others are concerned with maintaining what they currently have.
3. Control over IMTs and how they are mobilized/managed at PL-3 and higher.

To respond to the FEC direction to provide recommendations for addressing identified problems and issues, the EIM Task Team prepared an analysis comparing the potential effects and consequences of No-Action (i.e. maintain the status quo), the original EIM recommendations, and created a revised recommendation for consideration (see attached EIM Alternative Comparison Matrix). The revised recommendations incorporated feedback provided by partner and stakeholder groups in CY2013 and 2014. The intent of the analysis is to provide leadership with the range of options and ability to select elements from the different alternatives for further development and final approval.

**EIM Alternative Comparison:**
To address concerns with the EIM recommendation #1: all IMTs will be qualified at the Type 1 level; the revised recommendation is proposing we maintain the distinction between Type 1 and Type 2 IMTs but establish national templates to address speed to certification, streamlined development pathways, and how trainees are recruited and managed.

- Each GACG would maintain a mix of T1 and T2 IMTs based on historical need and what they can support.
- Learning pathways will be assessed to reduce redundancies, increase pathway opportunities, and evaluate ways to increase speed to certification.
- Allow bridging between some C&GS positions, and evaluate if there needs to be a distinction between Type 1 and Type 2 for some positions (i.e. FSC, IBA).
- Continue to use the RCA (or equivalent for states and incidents involving all-hazard) as the basis for determining incident complexity and type.
- Continue efforts with the EIM recommendations to validate IMT composition, size, membership, and management of trainees.

To address concerns with the EIM recommendations #2 and #3: only maintain 40 National IMTs and the NICC will manage mobilization/rotations at PL-3 and higher; the revised recommendation proposes each GACG-AC conduct an analysis to support the number of T1 and T2 IMTs needed and which can be supported by the GACG’s member agencies. NICC/NMAC can provide historical metadata for analysis. Each GACG-AC would be responsible for developing recommendations and implementing measures to sustain their target number of IMTs.

- The national target of Type 1 and Type 2 IMTs would be the aggregate of what each GACG-AC can staff and maintain.
- Each GACG would have discretion to assign IMTs within their geographic area, however NMAC retains authority for oversee to ensure national IMT management objectives are met.
• National Coordination System Council (NCSC) would continue to work with GACCs to evaluate changes to IMT rotations and mobilization to increase efficiency and help with leveling of IMT assignments.
  o Expand a geographic area’s rotation to include IMTs in multiple GA’s (i.e. similar to how the Rocky Mountain Area and Great Basin have combined their Type 1 IMTs into a Rocky-Basin Type 1 rotation).
  o During episodes of high activity/fire danger in a particular GA, use seasonal differences to pre-position or assign out-of-GACC IMTs from GA’s that are in low fire danger/activity.
  o Move away from calendar rotation schedules. Base IMT rotations on ‘rounds’ where all IMTs in that GA rotation go out before any IMT gets a second assignment.
• NMAC would continue to provide national direction, prioritization, resource allocation, and oversight of IMT assignments. SOPs, best practices, and exceptions would be spelled out in the National Mobilization Guide to help govern IMT use.

Lastly, the EIM Task Team analyzed Incident Command Application System (ICAP) data from 2014 IMT nominations and historical data for IMT use by agency (2004-2013). This information was used to develop a revised recommendation to ensure sufficient participation to sustain IMTs into the future, compared to the status quo and original EIM recommendations. The revised IMT participation recommendation proposes:
• Develop agency goals for IMT participation based on a 10-year average of IMT assignments by agency (see attached IMT Use by Agency chart). Participation goals would be agreed upon by agency leadership and overseen by NMAC.
• Geographic Area goals would be tiered from national goals and GA historical use, and overseen by the GACG-AC.
• Participation from state/county/local government agencies would continue to be encouraged, as would membership from other federal/state agencies that utilize ICS (law enforcement, Coast Guard, public works, etc.).
• Create national templates to standardize IMT governance practices nationwide (i.e. membership, tenure, prioritization, recruitment, etc.).
• Continue to use ADs to offset shortages of qualified agency personnel; however national guidelines for management of ADs are needed.

Agency Purview Recommendations
The November IMOSPT final report on EIM identified a number of issues that were inherently agency specific. These issues - shrinking workforce, diminishing IMT participation, compensation disincentives - resided largely within individual agency or department purview to effect change. They were categorized as “agency purview” issues. They were initially assigned to the EIM Project Agency Purview Work Unit, then to the NWCG Program Management Unit and EIM Project Manager, who developed the following recommendations for consideration by the FMB and the individual agencies. These are consistent with the goals stated in the IMOSPT final report. Resulting actions should be implemented through established agency decision making processes and directives systems.

1. Encourage all agency employees to take a role in supporting wildland fire incidents.
2. Develop standards (e.g. individual development plans) to ensure that trained individuals serve in the positions they have been trained for.
3. Establish consistent contracting practices among the agencies, including all-agency pre-season solicitations, virtual incident procurement, and use of agreements.
4. Establish formal fire-mentoring programs (e.g., USFWS and NPS programs) to recruit and develop employees into positions that are critically short.
5. Establish and enforce consistent fire management leadership training and qualifications standards for agency administrators.
6. Require agency administrators to establish and meet unit-level targets for IMT participation based on fire workload.
7. Establish mechanisms to provide agency administrators specific relief from resource management targets when fire priorities are paramount. Consider options such as use of suppression funds for backfill on home unit or payment of “Base 8” funding.
8. Provide recognition (verbal, written, monetary or non-monetary award, etc.) for home unit personnel who cover duties and enable fire-trained personnel to respond.
9. Develop standards and expectations for fire participation and support for both fire funded and non-fire funded personnel. Develop performance standards and incorporate into formal documents such as position descriptions as possible.

The following potential action warrants consideration by the FMB and the individual agencies. We did not include it in the above recommendations because it is more complex and difficult to achieve:

Pursue policy changes that address compensation constraints which are disincentives to incident participation. Options include:
- Eliminate the annual salary cap for those serving on incidents.
- Enable employees who reach salary cap limits to claim uncompensated hours as tax-deductible.
- Provide for portal-to-portal pay.
- Establish compensation for time served on incident commensurate with the position held.

High Level Schedule for Implementation
The final tasking to the EIM Task Team was to provide a high level schedule for implementing the above revised recommendations. Most of the EIM recommendations are incremental in nature, and are projected to require anywhere from 1 year to 5 years for full implementation. Some of the longer term changes would be the result of phased-in implementation with monitoring and adaptive modifications as the effect of these changes are monitored for effectiveness following implementation. However the social changes necessary to effect long-lasting changes will most likely require continued emphasis and attention by the individual agencies long after EIM is implemented. Implementation of the Revised Recommendation is projected to be shorter than the original EIM Recommendation as we will not have to transition Type 2 IMTs to the Type 1 level.

At some point the EIM Task Team should be dissolved and the work to continue the long-term changes be assigned as regular program of work for NWCG committees in the Preparedness or Training Branches (such as streamlining pathways in the PMS 310-1), or be the responsibility of individual agencies to manage (such as an employee career and mentoring program).

Once leadership has selected a final recommendation the EIM Task Team will be in a better position to project implementation time frames and develop a high level implementation schedule.

A few EIM tasks have already had significant amount of work completed and are projected to be closed out within the next year. Those tasks include:
- **NIMO Work Unit**: Efforts to better explain NIMO’s role and ordering process in the National Mobilization Guide, Redbook, and other publications was completed in 2013/2014.
- **Single Qualifications Work Unit**: The NWCG Operations and Workforce Development Committee (OWDC) conducted an assessment of all NWCG member agency qualifications and standards practices and determined that the PMS 310-1 is the base standard that all agencies
are following. All agencies supplement these requirements to some degree or another, however despite the individual agency supplement the ability to transfer from one agency to another or interact with other agency employees is unimpeded. Furthermore, NWCG has taken active measures to be compliant with HSPD-5 and is NIMS compatible. Additional efforts in the near future with the system of qualification endorsements will narrow the gap even further into one overarching qualification system for emergency response nationwide.

- **Area Command Work Unit:** Much progress was made in 2013 to regain the capacity to staff three Area Command Teams, with ability to staff four teams if needed. In 2014 an analysis was conducted looking at the historical usage of Area Command Teams, with a recommendation to maintain three Area Command Teams nationally. Additional work needed in this work unit includes standardizing the operating procedures of all Area Command Teams under a national template and evaluating the development pathway for AC positions and determine how they can be streamlined to increase speed to certification.

In closing, the EIM Task Team believes it has completed the tasks identified in the M-14-08 Tasking Memo and is prepared to provide a more in-depth briefing or answer questions. Supporting documentation referenced in this memo is attached as enclosures. For questions or additional information, please contact Evans Kuo, US Forest Service NIFC, ekuo@fs.fed.us, 208-387-5974.

Thank you

Evans Kuo
EIM Project Lead

Enclosures:
- EIM Alternative Comparison
- IMT Use by Agency Chart
- Agency Affiliation of 2014 IMT Applicants Chart
EIM Recommendation: #1 All IMTs will be qualified at the Type 1 level

Status-Quote: Maintain distinction between T1 and T2 IMTs. Each GACG would maintain their mix of T1 and T2 IMTs based on historical need and their capacity to support those IMTs.
- Recruitment and ensuring IMT succession would continue to be the responsibility of each GACG to manage.
- Development pathways in the PMS 310-1 would not change (i.e. T2 C&GS positions would be retained and would continue to be the gateway to T1 C&GS).
- Training requirements of 5-420, 1-400, and 5-520 would continue to be required as part of the T1 and T2 C&GS pathways.
- The Risk Complexity Analysis (RCA) would continue to provide distinction between T1 and T2 IMTs to assist managers when selecting the appropriate IMT based on risk assessment and complexity.
- Out of 1,432 IMT assignments recorded from 2004-2013 the national average for IMT ordered by type: o 24% Type 1 IMT
  o 76% Type 2 IMT
  o These percentages vary by agency and GA.

Original EIM Recommendation: Merge all Type 1 and Type 2 IMTs into one type of IMT, and all teams will be Type 1.
- Most (24) of the current Type 2 IMTs would be transitioned to Type 1 over the course of several years. A transition plan and target end date would be established.
- Type 2 IMTs would cease to exist in the future.
- Training and development pathways in the PMS 310-1 will be revised to chart a new pathway from Type 3/Unit Leader to T1 C&GS.
- Allow bridging between some C&GS positions.
- If S-520 continues to be a requirement for T1 C&GS, will need to expand the opportunities for more students to attend (additional S-520 courses or evaluate potential for a "Field S-520").
- Review the RCA to account for only one type of IMT when determining the appropriate level of IMT to order.

Pros:
- No significant changes that need to be communicated to the field or leadership.
- Allows GACG the flexibility to mobilize the type of IMT based on incident needs, and provide IMTs to other GACG’s when requested.
- Adheres to the ICS principle of scalable response instead of a one-size-fits-all approach to IMT typing.
- Allows GACG the discretion to tailor their mix of T1 and T2 IMTs to meet GA-specific needs and be responsive to the needs/desires of their member agencies.

Cons:
- Does not address national workforce succession concerns.
- Still relies on a voluntary model for IMT recruitment and participation.
- No significant improvement to speed to certification in the PMS 310-1. Development pathways for T1 and T2 C&GS positions remain the same.
- May not be in alignment with FEMA’s plans to structure incident complexity typing from 5-tiers to 3-tiers (local, state, national in the AH context, or T1 Complex, T2 Extended, T3 Initial for wildland fire).
- Does not address concern that the current training requirements are no longer meeting the agency’s needs and need to be overhauled.

Cons:
- Concern that merging all IMTs into T1 will not increase participation and may have the opposite effect as not all IMT participants are willing to be on a T1 IMT and/or supervisors may not want their employees to be part of an IMT that increases their time away from the home unit and home unit work.
- Many feel the degree of separation between T1 and T2 complexity is too great and do not believe there are sufficient personnel that can attain T1 certification to meet the need.
- Even with the proposed “speed to certification” concept, it will still require a significant amount of time to achieve T1 qualifications (20-25 years instead of 25-30).
- Does not allow for scalable response if all IMTs are the same (type, size, and configuration).
- Several GACG-AC and partners (NASF, IAFC, ICACC, and several of the GACG-ACs) are opposed to this recommendation.
- Concern that recommendation will result in loss of GA control to assign local IMT for rapid response.

Potential Risks and Cost Associated:
- Risk of current model not being sustained if there are no significant changes to IMT participation levels or workforce succession is not addressed.
- Lack of sustainability will result in a reduction in IMTs. NICC is already reporting a reduction from 54 IMTs in 2012 to 53 in 2014.
- Training and development costs are expected to remain the same if there are no changes to the current mix of IMTs.
- No significant change to the current pace of T1 C&GS certification (25-30 yrs), which results in an advancement of T1 C&GS close to retirement age.
- There is a heavy reliance on using retirees to fill C&GS positions and not enough emphasis on recruiting and developing agency personnel.
- As federal/state participation levels decrease, there will be an increase in county and local govt agency participation. In some locations the salary rate of county and local agency personnel is significantly higher than federal, resulting in higher personnel costs and perceptions of inequity.

Potential Risks and Cost Associated:
- If insufficient employees are able to attain T1 C&GS positions there will be a decrease in the number of IMTs available nationally.
- Some GACG have projected participation levels will decrease as not all employees are willing or will be allowed to participate on a T1 IMT.
- Until assessments are conducted and new learning pathways are built the effect on training costs is unknown, but costs may decrease if pathways can be streamlined.
- In some locations there is a bias towards not ordering a T1 IMT due to cost. If T2 IMTs’ are removed some units may attempt to manage incidents with T3 organizations that are ill-equipped to handle the complexity.
- Workforce succession and IMT participation needs to be addressed by individual agencies and successfully implemented for this alternative to succeed.

Potential Risks and Cost Associated:
- Workforce succession and IMT participation needs to be addressed by individual agencies and successfully implemented for this alternative to succeed.
- Participation levels are anticipated to remain at current levels or higher if streamlining can be implemented.
- Recommendation results in minimal change to IMT typing, other than the restructuring of the development pathways in the PMS 310-1. As such there will be minimal risk of opposition from partners or stakeholders.
- Until assessments are conducted and new learning pathways are built the effect on training costs is unknown, but costs may decrease if pathways can be streamlined.

Revised EIM Recommendation: Maintain distinction between Type 1 and Type 3 IMTs but establish national templates to address speed to certification, streamlined development pathways, and management of trainees.
- Each GACG would maintain a mix of T1 and T3 IMTs based on historical need and what they can support.
- Learning pathways will be assessed to reduce redundancies, increase pathway opportunities, and evaluate ways to increase speed to certification.
- Allow bridging between some C&GS positions, and evaluate if there needs to be a distinction between T1 and T2 for some positions (i.e. FSC, IBA).
- Continue to use the RCA (or equivalent) as the basis for determining incident complexity and type.
- Combine with EIM recommendations to improve efficiencies for IMT mobilization and leveling of assignments.
- Combine with EIM recommendations to validate IMT composition, size, membership, and management of trainees.
Status Quo: GACGs retain control over the number of T1 and T2 IMTs hosted as well as the IMT rotation and mobilization for incidents within their geographic area at all Planning Levels. NMAC retains responsibilities per the National Mobil Guide to provide national wildland fire operations direction, prioritization, allocation, and oversight.

- Number of IMTs and mix of T1 and T2 in each GA remain at current levels. Some GACGs may reduce numbers if experiencing difficulty in maintaining staffing.
- GACG establish incident priorities and IMT assignments for incidents within their GA.
- If additional IMTs are needed, orders for out-of-GACG IMTs are coordinated through the NICC and NMAC.
- NMAC retains authority to oversee all team assignments as necessary to achieve team experience objectives to ensure proficiency, manage fatigue, or for other reasons.

Original EIM Recommendation: Establish a national team for the number of National IMTs based on historical needs analysis. Validate NICC’s meta data and recommended IMT distribution per GA. The NICC would manage National IMT rotation and mobilization at PL-3 and higher.

- Type 2 IMTs (other than those solely intended for state use) would be transitioned to T1 IMT to achieve the target goal.
- The National IMT target would be an aggregate of what each GACG would host based on historical need. Anticipate that this would result in a reduction of 5-10 IMTs nationally.
- At PL-3 and higher all IMTs would be part of a national rotation coordinated by the NICC.
- State IMTs can be used as surge capacity as needed.

NWCC has established guiding principle for IMT mobilization to maintain GACG autonomy as much as possible, with oversight from NMAC.

- NMAC retains authority to manage all team assignments as necessary to achieve team experience objectives to ensure proficiency, manage fatigue, or for other reasons.
- Use closest IMT to manage new incidents as many of their key staff are make key staff available on their home units.

NWCC’s revised EIM Recommendation:

- EIM Recommendation: #2 Goal of creating 40 National IMTs; #3 Control over IMTs and how they are mobilized/managed at PL-3 and higher.

Evolving Incident Management: GACG autonomy is preserved to be responsive to local fire agencies. NICC/NMAC will retain oversight role for how IMTs are used nationally. IMT numbers and how teams are managed can be tailored to unique circumstances, local issues, and needs of their home unit.

- Greater IMT rotation flexibility for the T1 IMTs.
- Each GACG independently developing and implementing workforce succession actions may result in inconsistent practices unless national templates can be developed to coordinate efforts.
- Some out-of-GACG IMTs will not be as well versed with different fuel types and may initially require assistance dealing with local political concerns and relationships. However, a local liaison/representative can be assigned to alleviate this concern.

Pros:
- No significant changes that need to be communicated to the field or leadership.
- IMT numbers and how teams are managed can be tailored to unique circumstances, local issues, and needs of their home unit.
- Gives preference to in-GACC IMTs that are familiar with fuel type, local practices, and pre-existing relationships with local AAs and county officials.
- Use of in-GACC IMTs typically result in faster mobilization times to provide relief to local unit or T1 IMT.
- Retention of T2 IMTs allows for a more scalable response.

Pros:
- Having fewer IMTs is expected to make it easier to staff and regularly exercise all IMT.
- Creatives efficiencies by only having to mobilize one type of IMT capable of managing all incidents.
- A restructured IMT rotation could make more participants available to assist other teams during off-call periods. Current rotation of 1 week up, 2 weeks down provides insufficient time for off-call IMT members to accept other assignments.
- Use of out-of-GACC IMTs from areas of low fire danger to augment in-GACC IMTs in periods of high fire danger/activity would result in less impact to local units to manage IA and EA incidents and increase supervisor comfort level to allow their key staff to be on an IMT.
- Fire activity in geographic areas peak at different times throughout the year and can be used to establish a seasonal rotation of National IMTs such as North-south, east-west.
- NICC and NMAC controlling IMT rotation and mobilization could result in a leveling of IMT assignments and ensuring all IMTs are regularly exercised to maintain proficiency.

Pros:
- The alternative is in alignment with partner and stakeholder feedback received regarding number of IMTs and GACG autonomy. GACG autonomy is preserved to be responsive to local agencies. NMAC would retain oversight role for IMT assignments as well as increase proficiency and reduced exposure.
- Out-of-GACC IMTs would be used during episodes of high activity to provide relief to local IMTs by allowing those members to maintain proficiency.

Cons:
- Does not address national workforce succession concerns.
- Emphasis on using in-GACC IMTs can lead to an imbalance of IMT assignments nationwide, and IMTs in some GACGs are not being regularly exercised and can lose proficiency unless NMAC intervenes.
- Requires a complex system of GACC rotations and National rotations, and ties up a lot of personnel with commitments which reduces the overall number of resources that are available.
- Off-call periods are insufficient time for IMT members to take other assignments, further reducing the number of resources available.
- Many IMT members experience difficulty to balance IMT commitment and home unit responsibilities especially during the GA’s peak season.

Cons:
- Some participants have stated they do not want to be on a T1 IMT and their supervisors do not want them on a national rotation (longer absences).
- Concern that less IMTs will result in more assignments per year for the remaining IMTs.
- Critics of this recommendation cite local county officials will not understand why an out-of-GACC IMT is being mobilized when a local one can respond.
- Concern that out-of-GACC IMTs are not as well versed in fuel types, tactics, and local politics.
- Concern with the higher cost of out-of-GACC mobilization.
- Concern with potential risk transference to T3 organization due to longer mobilization times for an out-of-GACC IMT.

Cons:
- Each GACG independently developing and implementing workforce succession actions may result in inconsistent practices unless national templates can be developed to coordinate efforts.
- Some out-of-GACC IMTs will not be as well versed with different fuel types and may initially require assistance dealing with local political concerns and relationships. However, a local liaison/representative can be assigned to alleviate this concern.
- Local line officer (District Ranger, Field Office Manager, Refuge Manager, etc) would be the ideal liaison to interact with county officials, commissioners, cooperating agencies, and stakeholders.
- Local PMO or AFMO could be assigned as a liaison to the IMT to provide assistance with local knowledge and tactics.

Potential Risks and Cost Associated:
- Requires a complex system of GA and Nat’l IMTs rotations for the T1 IMT.
- Complex rotation systems have a net effect of making less people available. Not as effective as a national or single rotation system and is harder to manage.
- When a GACG relies heavily on in-GACC IMTs and mobilizes multiple IMTs at once there can be a significant reduction in a local unit’s capability to manage new incidents as many of their key staff are deployed with their IMTs and are not on their home units performing their normal functions.

Potential Risks and Cost Associated:
- Increased use of out-of-GACC IMTs to fill assignments may result in longer mobilization times and cost, and increased exposure for EA (T3 personnel).
- Using IMT like Nat’l Shared Resources would enable more strategic use of resources to high activity areas and make more resources available.
- Would need to transition at least 24 T2 IMTs to T1 level, which would take multiple years to achieve.

Potential Risks and Cost Associated:
- Increased use of out-of-GACC IMTs could increase mobilization costs and travel exposure.
- However increased use of out-of-GACC IMTs can result in more proficiency and reduced exposure.
- Less reliance on in-GACC IMTs during peak episodes of high fire danger/activity will reduce risk of exceeding a local unit’s draw-down capability and make key staff available on their home units.
### EIM Recommendation: Ensuring Sufficient IMT Participation

**Original EIM Recommendation:** NWCG recognizes that workforce succession and IMT participation are management issues that fall under individual agency purview. The original EIM recommendation is to coordinate development of recommendations that agencies can use to reduce barriers and disincentives to participation.

- Move away from voluntary participation and establish agency expectations for all employees to support fire, i.e., requiring support for fire protection in position description.
- Develop formal mentoring and career assistance programs to encourage development and interest.
- Provide opportunities for some support roles to be performed virtually (from home unit).
- Establish performance measures for line officers and supervisors to support IMT participation / fire protection efforts.
- Develop compensation systems with incentives and accountability measures; provide relief to pay caps.
- Address concerns with personal liability and support for line officer decision making.
- Balance resource target accomplishment with the need to support management of large fires.

NWCG has proposed additional actions under EIM to address participation concerns:

- Create national template to standardize IMT governance practices nationwide (i.e. membership, tenure, prioritization, recruitment, management of trainees).
- Create a national template for how ADs will be managed to sustain IMTs.
- Establish assurance measures to promote participation with support from all agencies.
- Increase number and use of virtual support (some states/county地方政府 agencies work, etc.).
- Develop formal mentoring and career assistance programs.
- Establish performance measures.
- Need to balance target accomplishment with supporting large fires.

### Revised EIM Recommendation:

- In addition to analyzing EIM proposals to reduce or eliminate barriers and disincentives to participation, evaluate options to establish national IMT participation goals for each agency.
- Develop goals for IMT participation for each agency based on a 10-year average of IMT use by agency (see chart). Goals would be agreed upon by agency leadership and overseen by NNAC.
- GA goals would be tiered from national goals/GA historic use, and oversee by the GACG-AC.
- Participation from state/county/local government agencies would continue to be encouraged, as would membership from other federal/state agencies that utilize IC (law enforcement, Coast Guard, public works, etc.).
- Continue to use ADs to offset shortages of qualified agency regular personnel; however national guidelines for management of ADs are needed.
- Coordinate development of recommendations that agency reaps on FMF and NWCG can take back to their agencies to address agency purview issues to increase future targets.

### Potential Risks and Costs Associated:

- If the federal workforce continues to shrink, and/or workforce succession issues are not addressed, the state/county/local government participation rates could exceed federal agencies (in some states/GA this is already occurring).
- Federal agencies are major users of IMTs. Approx. 75% of IMT assignments are ordered state/county/local government agencies (in some states,GAs is already ordering from federal agency).
- If federal participation numbers do not increase, the trend could give rise to the perception that federal agencies are not doing enough to support management of large wildland fires and are relying too much on state, county, and local government partners.
- Wildland fire management skills need to be regularly exercised to gain and maintain proficiency. Lack of participation could lead to decrease in proficiency.
- It is extremely expensive to play catch up.

### Potential Risks and Costs Associated:

- Some of these recommendations may be outside of even agency/dept purview and will require support from congress to change legislation.
- The potential consequences of prioritizing fire suppression over target accomplishment needs to be weighed.
- If barriers to participation are not addressed fed/state participation on IMT's will continue to decline. This would result in fewer IMTs or an even heavier reliance on ADs and local government participation to fill the gap.

### Cons:

- IMT participation is based on a voluntary system, and lacks assurance measures to ensure IMT positions are filled.
- Does not address workforce succession concerns.
- Does not address the difficulties balancing home unit responsibilities (management targets or IFAA participations) with commitment to IMT.
- Lack of national template can result in inconsistent IMT governance practices between GAs, and without a template the inconsistencies will remain.
- Many IMTs have to use of multiple employees to share positions to fill their roster. In some cases same employee is shared between multiple IMTs.

<table>
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<th>Pros:</th>
<th>Cons:</th>
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<td>- Most IMTs are interagency, with representation from feds, state, county, and local govt employees.</td>
<td>- The technical challenges of some of these recommendations to reduce/eliminate barriers may be outside of even agency/dept purview.</td>
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<tr>
<td>- Many GA’s already have policies in place to govern IMT membership, tenure, recruitment, and prioritization.</td>
<td>- Even if target relief is granted, need to be mindful of the significant downstream consequences that can have a long lasting external impact on partners and joint land management efforts.</td>
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<td>- Many GA’s have good working relationships with county/local government agencies. ICA applicants from county/local govt agencies make up 15.8% national average.</td>
<td>- Need to balance target accomplishment with supporting large fires.</td>
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### Potential Risks and Costs Associated:

- If the federal workforce continues to shrink, and/or workforce succession issues are not addressed, the state/county/local government participation rates could exceed federal agencies (in some states/GA this is starting to occur).
- Federal agencies are major users of IMTs. Approx. 75% of IMT assignments are ordered state/county/local government agencies (in some states,GAs is already ordering from federal agency).
- If federal participation numbers do not increase, the trend could give rise to the perception that federal agencies are not doing enough to support management of large wildland fires and are relying too much on state, county, and local government partners.
- Wildland fire management skills need to be regularly exercised to gain and maintain proficiency. Lack of participation could lead to decrease in proficiency.
- It is extremely expensive to play catch up.

### Potential Risks and Costs Associated:

- Some of these recommendations may be outside of even agency/dept purview and will require support from congress to change legislation.
- Potential for the IMT participation goals to be unattainable for some agencies, and run the risk of setting them up for failure.
- If barriers to participation are not addressed fed/state participation on IMT's will continue to decline. This would result in fewer IMTs or an even heavier reliance on ADs and local government participation to fill the gap.
This snapshot looks at the number of current agency employees who applied to participate on IMTs in 2014.

- 2014 is the first year ICAP was used by all geographic areas to collect IMT applications. Complete prior year data are not available.

- Most geographic regions mirror national proportions, though California shows significantly higher participation by state, county, and local agencies.

- The national average of IMT applicants who are AD is 19%. In the geographic areas, AD applicants represent 13-28% of the total.

- Complete data charts with breakouts of ICS sections, agencies, and geographic areas may be viewed at:  

  http://www.nwcg.gov/imosp/
2014 ICAP DATA:
IMT. APPLICANT POOL BY AGENCY AND GEOGRAPHIC AREA

ICAP Data Analysis

Assumptions

- Data are distilled from raw ICAP data.
- These data reflect all applicants, and thus analyze recruitment and interest. The data do not distinguish between Selected and Denied, nor between Trainee and Qualified.
- The data reflect one single individual applicant, and eliminate duplicate applications by a single individual. Thus, the data reflect true numbers of individuals who applied to IMTs.
- Some duplication may exist among regions, as several applicants applied to multiple Geographic Areas (GA). However, this is generally less than 5 individuals per GA. Duplicates were eliminated on the National count, thus the National totals will not be equal to the sum of the individual GAs.
- Individuals who applied to multiple sections of the IMT organization were designated to a section as such, in order of priority:
  1. If an applicant identified a Command and General Staff (CGS) position, they were counted under CGS, regardless of selection or trainee status. This reflects interest and willingness to promote into higher levels of responsibility.
  2. If selection was indicated for one position, that section was selected.
  3. If no selection was indicated, the section with most qualifications listed was selected.
  4. If an equal number of qualifications were listed across sections, the section with the applicant’s highest qualification was selected.
- On the original spreadsheets, the qualification used to designate the section is shown first. The exception is where an employee expressed interest or trainee status for a CGS position but was selected for a different position. In this case, the selected position is listed first, but the applicant is still counted under CGS.
- “Rural Fire District” was changed to “County and Local” (C&L) and combined with any local or county fire district identified.
- It is probable that “Other” is most often a county or local fire district, because the agency is self-selected by employees who likely did not think their agency fit into any of the options. However, information has not been sufficiently examined to make a confident determination. Therefore, Other and C&L are analyzed both separately and combined.
### National totals

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If we assume Other is C&L:

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### Rocky Mountain Geographic Area

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If we assume Other is C&L:

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### Northern Rockies Geographic Area

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If we assume Other is C&L:

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### If we assume Other is C&L:

- C&L: 38 4 12 2 23 11 6 1 0 3 0 9.5 6.9
Northwest Geographic Area

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</table>

If we assume Other is C&L:

| C&L   | 118                          | 10  | 42       | 7         | 18  | 32   | 19    | 2         | 1           | 2      | 4         | 11.9                        | 8.5                |
This snapshot looks at use of Incident Management Teams by agency for a 10 year period, 2004-2013.

- Pie chart shows national use, and the columns show IMT use by each Geographic Area.
- Data do not include state IMTs that are not available for national assignment.
- Data were obtained from NICC reports, FireStat database, and GACC websites.
- 2004 data were incomplete, and jurisdiction was determined by analyzing a variety of information on the internet.

Although many large incidents cross multiple jurisdictions and are managed under unified command, the “use by agency” was assigned to the agency of original jurisdiction, and according to the assigned incident number.

Totals in the breakout by Geographic Area do not include FEMA or ‘other’ assignments, and may not total 100%. For example, the Southern Area had 109 IMT activations for FEMA emergencies, which accounts for 62% of their IMT use.

### Number of Agency Employees Applying to Participate on IMTs in 2014

Numbers are applicants only, and not actual selected members of IMTs, compiled from ICAP application data. Percent indicates proportion of the applicant pool represented by each agency.

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<tr>
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<th>USFS</th>
<th>S,C&amp;L</th>
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<tr>
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<td>39</td>
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</table>

2014:

- DOI: 810 (20%)
- USFS: 1979 (50%)
- S,C&L: 1182 (30%)
USE OF TYPE 1 vs TYPE 2 I.M.T.s, 2004-2013

These tables display how often a Type 1 IMT or Type 2 IMT was assigned to an incident when a Geographic Area requested a team.

For example: Nationally, IMTs were assigned to all known agencies 1,432* times between 2004-2013. Of those incidents, a Type 1 IMT was utilized 24% of the time, and a Type 2 IMT was utilized 76% of the time.

For an agency- and area-specific example, of the 110 IMT assignments to FEMA incidents in the Southern Area, Type 1 IMTs were assigned to 56 incidents, or 51% of the total.

*Note that these numbers do not represent 1,432 unique Incidents, as T1 and T2 IMTs often transition on the same incident as conditions change.
May 22, 2014

MEMORANDUM

TO: Fire Management Board

FROM: Fire Executive Council

SUBJECT: Evolving Incident Management

At its April 8, 2014, meeting the Federal Fire Policy Council (FFPC) discussed a number of issues and concerns regarding the “Evolving Incident Management” (EIM) initiative/activity. Those issues are captured in the EIM briefing paper for that meeting. At the conclusion of its discussion the FFPC asked the Fire Executive Council (FEC) to organize and oversee development of additional information, analysis, and options to address the issues and concerns.

The FEC subsequently met and discussed how to implement the tasking from FFPC. The FEC co-chairs subsequently met with the National Association of State Foresters Forest Fire Protection Committee to discuss and coordinate the approach. This memorandum provides direction and expectation to the Fire Management Board.

1. **Update and validate the “case for change”**
   Review the NWCG “case for change” in order to validate original intent and the nature of the problems with the status quo. Review analyses results, alternatives depicted, and final Phase One Report to validate and consider any needed updates based upon new information. Validate the Phase Two Strategic Implementation Plan. The following issues and topics are to be addressed:
   - New insights
   - Changed conditions
   - Costs
   - Time to implement
   - Complexity associated with implementation
   - Risks associated with implementation
   - Consequences of not making adjustments
   - Identify the roles and responsibilities for intergovernmental and agency bodies including decision-making roles for each work area.

In updating and validating the “case for change”:
   - Recognize that although much of the analysis will be reviewing and updating prior work, give attention to new insights, changed conditions, new data, etc.
   - Include NASF and others as full partners in the work
   - Engage and utilize subject matter expertise.
   - Engage affected stakeholders (especially line officers and agency administrators, federal and non-federal) in collection of data and analysis of alternatives and implications
2. Continue with certain implementation activities, but not with others

The workforce management challenges facing the interagency wildland fire program require changes to our current practices. During this period of re-examination and re-validation of those challenges and the options available to address them, federal agencies will continue with all activities that support any option for addressing the workforce management problems highlighted in the original NWCG case for change.

However, activities that assume adoption of a particular alternative, such as the number of national interagency teams available for national response, qualification levels for members of those teams, or changes to mobilization processes or that foreclose management options for alternatives will not occur in 2014. Federal wildland fire program managers, working with affected partners and stakeholders, will determine which activities are to be suspended in order to preserve the prerogatives of agency leadership to make final decisions.

3. Reporting and Deliverables

- In mid-summer 2014 the FMB will provide a progress/status report
- FMB should be prepared to deliver to the FEC in the fall of 2014 a report and analysis that:
  - Updates the case for change
  - Provides recommendations for addressing identified problems and issues
  - Provides a high level schedule for implementing those recommendations

The FEC will provide analysis and recommendations to the Federal Fire Policy Council for final decision.
MEMORANDUM – 11 July 2014

TO: Evans Kuo, Project Lead, Evolving Incident Management

FROM: Dan Smith, Chair, NWCG Executive Board
       Bill Kaage, Chair, Fire Management Board

SUBJECT: Fire Management Board Direction for Evolving Incident Management via NWCG EIM Project

On May 30, 2014 the Fire Management Board (FMB) received a tasking memorandum from the Fire Executive Council (FEC) regarding the National Wildfire Coordinating Group (NWCG) Evolving Incident Management (EIM) project. FEC expectations include fall 2014 delivery of a report and analysis that:

- Updates the EIM case for change.
- Provides recommendations for addressing identified problems and issues.
- Provides a high level schedule for implementing those recommendations.

FMB is requesting assistance from you and your project team, through the NWCG Executive Board, to conduct the required analysis and develop the requested report.

We would like to meet with you at your first convenience to discuss the FEC memorandum, FMB expectations, and develop an initial plan with a timeline for task completion.

cc: NWCG Executive Board, FMB Members, NWCG Program Management Unit (PMU)