NWCG Memorandum No. 14-016  
Date: 6 October 2014  
TO: Bob Roper, Chair, IAFC Wildland Fire Policy Committee  
FROM: Dan Smith, Chair, NWCG Executive Board  
SUBJECT: Response to concerns regarding the NWCG Evolving Incident Management project

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 2014, the National Association of State Foresters and the International Association of Fire Chiefs provided written concerns to the NWCG regarding the direction of the EIM project. NWCG also received direction from the federal Fire Management Board to address specific concerns about EIM. Based on this direction, 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, and has been delivered to the Fire Management Board. 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.

Should the Fire Management Board accept the EIM project team’s recommendations, and should those recommendations address the issues you identified as well, the NWCG Executive Board 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. We appreciate your input and look forward to continued collaboration on this work.

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
- IAFC letter on EIM
- NASF Direction on EIM
- NWCG Tasking Memo M-14-08 Fire Management Board Direction for Evolving Incident Management via NWCG EIM Project

cc: NWCG Executive Board, NWCG Program Management Unit (PMU), EIM Project Team Lead
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

NWCG

• 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 quo:***
- Maintain distinction between 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 GAG 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:
  - 76% Type 2 IMT
  - 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 5-520 continues to be a requirement for T1 C&GS, will need to expand the opportunities for more students to attend (additional 5-520 courses or evaluate potential for a "Field 5-520")
- Revise 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 GAGs to mobilize the type of IMT based on incident needs, and provide IMTs to other GA’s when requested.
- Adheres to the ICS principle of scalable response instead of a one-size-fits-all approach to IMT typing.
- Allows GAGs 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 restructure incident complexity typing from 5-tiers to 3-tiers (local, state, national in the AH context, or T2 Complex, T2 Extended, T3 Initial for wildland fires).
- Does not address concern that the current training requirements are no longer meeting the agency’s needs and need to be overhaul.

**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 system.
- No significant change to the current pace of T1 C&GS certification (25-30 yrs), which results in a retirement 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 Costs and Risk 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 GAGs have projected participation levels will decrease as not all employees are willing or able to participate to 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.

**Revised EIM Recommendation:**
- Maintain distinction between Type 1 and Type 1 IMTs but establish national templates to address speed to certification, streamlined development pathways, and management of trainees.
- Each GAG 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 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.

**Pros:**
- Retaining the distinction between T1 and T2 IMT type/level.
- Maintains a more incremental progression from T3/Unit Leader to T1 C&GS qualifications.
- Developing streamlined pathways and bridging options will reduce redundancies and the time it takes to develop C&GS positions.
- Gives GAGs the flexibility to manage their IMTs and ascertain the mix of T1 and T2 that are needed, which is in alignment with responses received from NAFS, IACF, ICACC, and several of the GAGs-ACs.
- Time to implement will be significantly shorter since do not have to transition 24 (approx) T2 IMTs to T1 level.

**Cons:**
- Still relies on a voluntary model for IMT recruitment and participation.
- May not be in alignment with FEMA’s plans to restructure incident complexity typing from 5-tiers to 3-tiers (local, state, national in the AH context, or T2 Complex, T2 Extended, T3 Initial for wildland fire).

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

Original EIM Recommendation: Establish a national approach 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 if needed.

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

- NMCC 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 for rapid response when life/property is imminently threatened.
- Be mindful of higher costs that can be associated with out-of-GACC IMT mobilizations.
- Utilize out-of-GACC IMTs to augment in-GACC IMTs during episodes of high fire activity to avoid impacting local units’ IA and EA capabilities.
- Consider use of out-of-GACC IMTs for pre-positioning or planned replacements.

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 responsive to individual GACC member agencies.
- 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 TSCC.
- Retention of T2 IMTs allows for a more scalable response.

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 commitments and home unit responsibilities especially during the GA’s peak season.

Potential Risks and Cost Associated:
- Requires a complex system of GA and Nat’l IMTs for the T1 IMTs.
- Complex rotation systems have a net effect of making less people available. Not as effective as a single or single rotation system and is harder to manage.
- When a GACC 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 IMTs 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.

Revised EIM Recommendation: Request each GACC to develop an analysis to determine the number of T1 and T2 IMTs that are needed and can be supported by member agencies. NICC/NMAC can provide historical metadata for analysis. Each GACG would be responsible for developing recommendations and implementing measures to sustain their target number of IMTs.

- The national target of T1 and T2 IMTs would be the aggregate of what each GACG recommends and can support.
- Each GACG will have discretion to assign IMTs within their GA, however NMAC would conduct oversight for national IMT management objectives.
- NMAC would continue to work with GACG to evaluate changes to IMT rotation/costs, local fire danger, and increase efficiency and help with IMT leveling.
  - Expand a GA’s rotation to include IMTs in the GA’s historic NMAC responsibilities.
  - During episodes of high activity/fire danger in a particular GA, use seasonal differences to preempt IMT mobilization.
  - 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 Nat Mob Guide to help govern IMT use.

- Establish procedures for NICC and GACGs to share responsibility for managing IMT assignments.

Pros:
- This 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 member agency needs. NMAC would 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 responsive to individual GACG member agencies.
- Restructured rotation schedules would help level IMT organizational assignments; assignments would enhance IMT capabilities as well as increase supervisor comfort level to allow their employees to participate.
- Balances use of in-GACC and out-of-GACC IMTs to prevent draw down of critical overhead during episodes of high activity/fire danger.
  - In-GACC IMTs would be used for emerging incidents that require rapid response.
  - Out-of-GACC IMTs would be used during episodes of high activity to provide relief to local IMTs to allow those members to tend needs of their home unit.

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 social-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 AAs, 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.
Evolving Incident Management
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Alternative Comparison Matrix
Draft Sept 16, 2014

EIM Recommendation: Ensuring Sufficient IMT Participation

Status Quo: IMT participation continues to be voluntary. The decision to participate is up to the employee, and requires supervisor or line officer approval.

- Each GACG oversees the governance of IMT membership, recruitment, and selections.
- Approximately 70% of IAP applicants are from federal agencies based on 2014 IACP data:
  - FS: 49.8% o BIA: 1.1% o BLM: 12.8% o FWS: 2.5% o NPS: 3.9% o

Potential Risks and Costs Associated:

Pros:
- Most IMTs are interagency, with representation from feds, state, county, and local govt employees.
- Many GA’s already have policies in place to govern IMT membership, tenure, prioritization, recruitment, and prioritization.
- Many GA’s have good working relationships with county/local govt agencies. IACP applicants from county/local govt agencies make up 15.8% national average.

Cons:
- The trend could give rise to the perception that Federal agencies are major users of IMTs. Approx. 75% of IMT assignments are ordered by federal agencies (84% if including FEMA) based on NICC 2004-2013 historical data. National percentages:
  - FS: 56% o BIA: 2% o BLM: 13% o FWS: 3% o NPS: 3% o FEMA: 9% o
- Approximately 16% of the IMT assignments are ordered by state-county/local government.
- Of the 1,412 incidents occurring nation-wide in the last 10 years (2004-2013):
  - A T1 IMT was ordered 24% of the time
  - A T2 IMT was ordered 76% of the time
- These percentages vary by Geographic Area.

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.

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 MMAC.
- GA goals would be tiered from national goals/GA historic use, and overseen by the GACG-AC.
- Participation from state/local/federal govt 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, management, 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 reps on FMF and NWCG can take back to their agencies to address agency purview issues to increase participation with support from all agencies.
  - o Agency expectations and high level support.
  - o Formal mentoring and career assistance programs.
  - o Increase number and use of virtual support positions as well as Service Centers.
  - o Compensation incentive measures.
  - o Establish performance measures.
  - o Need to balance target accomplishment with supporting large fires.

Potential Risks and Costs Associated:
- If the federal workforce continues to shrink, and/or workforce succession issues are not addressed, the state/count/loc gov’t 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 (84% if including FEMA) in 2004-2013 were ordered by a 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 govt 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.

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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/
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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## 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:

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If we assume Other is C&L:

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If we assume Other is C&L:

| C&L    | 318                       | 38  | 90  | 12  | 96 | 48  | 70 | 12    | 1   | 11    | 6      | 45.1       | 11.9     |                   |
## Great Basin Geographic Area

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If we assume Other is C&L:

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If we assume Other is C&L:

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<th>CGS</th>
<th>Finance</th>
<th>Logistic</th>
<th>Ops</th>
<th>Plans</th>
<th>CGS AD</th>
<th>Finance AD</th>
<th>Logistics AD</th>
<th>Ops AD</th>
<th>Plans AD</th>
<th>% by Agency of all Applicants</th>
<th>% of ADs by Agency</th>
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## Eastern Area

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<th>Ops</th>
<th>Plans</th>
<th>CGS AD</th>
<th>Finance AD</th>
<th>Logistics AD</th>
<th>Ops AD</th>
<th>Plans AD</th>
<th>% by Agency of all Applicants</th>
<th>% of ADs by Agency</th>
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If we assume Other is C&L:

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<th>CGS</th>
<th>Finance</th>
<th>Logistic</th>
<th>Ops</th>
<th>Plans</th>
<th>CGS AD</th>
<th>Finance AD</th>
<th>Logistics AD</th>
<th>Ops AD</th>
<th>Plans AD</th>
<th>% by Agency of all Applicants</th>
<th>% of ADs by Agency</th>
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### Northwest Geographic Area

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<th>ADs</th>
<th>CGS</th>
<th>Finance</th>
<th>Logis</th>
<th>Ops</th>
<th>Plans</th>
<th>CGS AD</th>
<th>Finance AD</th>
<th>Logis AD</th>
<th>Ops AD</th>
<th>Plans AD</th>
<th>% of ADs by Agency</th>
<th>% of ADs by Region</th>
</tr>
</thead>
<tbody>
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<td>0</td>
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<td>0.7</td>
<td>14.3</td>
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<td>1</td>
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<td>4</td>
<td>0</td>
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<td>147</td>
<td>180</td>
<td>196</td>
<td>164</td>
<td>89</td>
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<td>49</td>
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<td>11.2</td>
<td>18.5</td>
<td>11.9</td>
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If we assume Other is C&L:

<table>
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<tr>
<th>Agency</th>
<th>ADs</th>
<th>CGS</th>
<th>Finance</th>
<th>Logis</th>
<th>Ops</th>
<th>Plans</th>
<th>CGS AD</th>
<th>Finance AD</th>
<th>Logis AD</th>
<th>Ops AD</th>
<th>Plans AD</th>
<th>% of ADs by Agency</th>
<th>% of ADs by Region</th>
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</thead>
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<td>18</td>
<td>32</td>
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<td>1</td>
<td>2</td>
<td>4</td>
<td>11.9</td>
<td>8.5</td>
</tr>
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</table>
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.

<table>
<thead>
<tr>
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<th>DOI</th>
<th>USFS</th>
<th>S,C&amp;L</th>
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<td>214</td>
</tr>
<tr>
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<td>32</td>
<td>32</td>
</tr>
<tr>
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<td>106</td>
<td>40</td>
</tr>
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<td>28</td>
<td>108</td>
<td>25</td>
</tr>
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<td>Alaska</td>
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<tr>
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<td>233</td>
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<tr>
<td>Great Basin</td>
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<td>127</td>
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**V.5, 8/8/14**

**D R A F T**
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.

<table>
<thead>
<tr>
<th></th>
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<th>NW</th>
<th>CA</th>
<th>GB</th>
<th>SW</th>
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</tr>
<tr>
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<td>0%</td>
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</tr>
<tr>
<td>T2</td>
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<tr>
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<td>35</td>
<td>90%</td>
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<td>FS</td>
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<td></td>
</tr>
<tr>
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<td>0</td>
<td>0%</td>
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<tr>
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<td>13</td>
<td>59%</td>
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<tr>
<td>T2</td>
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<td>37%</td>
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</tr>
<tr>
<td>FS</td>
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<tr>
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<td>T2</td>
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<td>87%</td>
<td>93</td>
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</tbody>
</table>
July 7, 2014

Mr. Dan Smith, Chair
National Wildfire Coordinating Group
National Interagency Fire Center
3833 South Development Avenue
Boise, ID 83705

Dear Mr. Smith,

I am writing to share some concerns the International Association of Fire Chiefs (IAFC) has with development of the concept of Evolving Incident Management (EIM) being done by the National Wildfire Coordinating Group (NWCG).

EIM is a concept the IAFC believes is essential for moving forward incident-management team development. The IAFC also recognizes that some parts of EIM are controversial and may take more time and effort to develop and to gain acceptance of it by all of the partners. Our concern is that all work on EIM has stopped as a result of those controversial items. There are several other areas that are not controversial and have support that we would like to see work continue on.

The IAFC would like to see work continue on the EIM initiatives listed below. The IAFC believes that suspending work on these items is not in the best interest of the fire service and work should continue. The initiatives are:

- Analyze current development pathways for Type 1 and Type 2 Command and General Staff (C&GS) positions and recommend ways to eliminate or reduce redundancies and/or barriers that will increase speed-to-competency.

- Formalize the development of qualification position standards for Type 3 C&GS positions to increase capacity for extended attack incidents, provide a mechanism to nationally mobilize Type 3 single resource positions, and for non-fire line positions allow for cross-credentialing with FEMA All-Hazard and DOI-All Hazard qualifications.

- Continue to work with the National Coordination System Council (NCSC) and GACG-ACs to explore opportunities to improve IMT mobilization and rotation efficiencies.

- Continue efforts to work with the Incident Commander / Area Commander Council (ICACC) to validate IMT composition, size, membership and ways to manage trainee development.

- Continue efforts to move forward with plans to increase Area Command Team capacity in 2014 and evaluate development pathways for future Area Command positions.
Through our representative on the NWCG Executive Board, we are committed to support this development effort and hope that work can continue on the items listed above.

If you have any questions, please contact Will G. May, Wildland Fire Program Coordinator, at 352-494-4312.

Regards,

Chief William R. Metcalf, EFO, CFO, FIFireE
President and Chairman of the Board

Cc: Sean Cross, NWCG Manager
MEMORANDUM

TO: Dan Smith, National Wildfire Coordinating Group Chair
FROM: Bob Harrington, NASF Fire Committee Chair
DATE: May 27, 2014
SUBJECT: NASF Direction on Evolving Incident Management

In the last few months there have been a lot of discussions among senior leadership within the DOI Office of Wildland Fire (OWF), USDA Forest Service, and National Association of State Foresters (NASF) proposing a pause or redirection to the implementation of Evolving Incident Management (EIM).

Since then members of the National Wildfire Coordinating Group (NWCG) and Fire Management Board (FMB) have met and discussed this issue with the Federal Fire Policy Council (FFPC) and the chair of NASF Fire Committee. The NASF Fire Committee met recently and agreed to provide the following direction to NWCG on EIM.

Some of the EIM recommendations appear to be out of alignment with Geographic Area Coordinating Group Advisory Councils (GACG-AC), Forest Service and DOI Senior Fire Leadership, and State Foresters.

However, it is important to note that OWF and Forest Service FAM directors and the NASF chair have agreed to use this opportunity to re-engage with agency leadership and have not directed NWCG to discontinue efforts to work on key EIM recommendations which are supported by field organizations.

The NASF Fire Committee recognizes that NWCG acknowledges these concerns and, over the next few months, will validate a course of action and make adjustments as interagency leadership provides updated guidance and direction.

The NASF Fire Committee provided guidance that further efforts to develop the implementation procedures for the following key recommendations be suspended until further direction from agency and partner leadership can be established.

1. Recommendation that we will have one type of IMT, and all IMTs will be Type 1
2. Recommendation to eliminate Type 2 IMT qualifications
3. Recommendation to scale down to 40 Type 1 IMTs
4. Recommendation that NICC will manage the IMT rotation and mobilization at Planning Level 3 and higher

The NASF Fire Committee agrees with many EIM recommendations which do have good support with positive encouragement from partners and stakeholders to continue efforts. The NASF Fire Committee would like for NWCG to continue efforts to analyze and propose implementation procedures for the following work for agency vetting:

- Analyze current development pathways for Type 1 and Type 2 Command and General Staff (C&GS) positions and recommend ways to eliminate or reduce redundancies and/or barriers
that will increase speed-to-competency. Until further direction is received, Type 2 C&GS qualification standards will remain in effect in the PMS 310-1 Wildland Fire Qualification System Guide.

- Formalize the development of qualification position standards for Type 3 C&GS positions to increase capacity for extended attack incidents, provide a mechanism to nationally mobilize Type 3 single resource positions, and for non-fireline positions allow for cross-credentialing with FEMA All-Hazard and DOI-All Hazard qualifications.
- Continue to work with the National Coordination System Council (NCSC) and GACG-ACs to explore opportunities to improve IMT mobilization and rotation efficiencies.
- Continue efforts to work with the Incident Commander / Area Commander Council (ICACC) to validate IMT composition, size, membership, and ways to manage trainee development. This effort will be expanded to include Type 2 IMTs as well as Type 1.
- Continue efforts to move forward with plans to increase Area Command Team capacity in 2014, and evaluate development pathways for future Area Command positions.

NWCG should continue to seek solutions and better engage all partners in this complex project. Collaboration with stakeholders has been, and will continue to be, an important component of Evolving Incident Management. We need to establish clear and concise methods of communication with line officers, geographic coordinating groups and within the interagency wildland fire governance structure. The NASF Fire Committee would like to see timelines or benchmarks established to review progress and reevaluate components of EIM.

Lastly, NWCG should continue efforts to engage with agency and partner line officers to analyze EIM recommendations to reduce or eliminate barriers and disincentives to participation on incident management teams. Many of these recommendations fall under individual agency purview to implement, and involvement with agency line officers is a critical component in this effort.

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M-14-08
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)