

Alternative Comparison Matrix

EIM Recommendation: #1 All IMTs will be qualified at the Type 1 level

<p>Status Quo: Maintain distinction between T1 and T2 IMTs.</p> <ul style="list-style-type: none"> 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 S-420, I-400, and S-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: <ul style="list-style-type: none"> 24% Type 1 IMT 76% Type 2 IMT These percentages vary by agency and GA. 	<p>Original EIM Recommendation: Merge all Type 1 and Type 2 IMTs into one type of IMT, and all teams will be Type 1.</p> <ul style="list-style-type: none"> 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"). Revise the RCA to account for only one type of IMT when determining the appropriate level of IMT to order. 	<p>Revised EIM Recommendation: Maintain distinction between Type 1 and Type 2 IMTs but establish national templates to address speed to certification, streamlined development pathways, and management of trainees.</p> <ul style="list-style-type: none"> 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 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.
<p>Pros:</p> <ul style="list-style-type: none"> 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 GA'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. 	<p>Pros:</p> <ul style="list-style-type: none"> Simplifies the system of only having to manage and maintain one type of IMT, and creates IMTs that are capable of managing incidents of all complexity. Increases the number of Type 1 IMTs nation-wide. Allows alignment of wildland fire incident complexity typing with FEMA's desire to only have three tiers instead of the current five. Some positions do not have much distinction between T1 and T2. Speed to certification would increase by removing Type 2 level qualifications from the development pathway. For some positions there will be an intermediate qualification of Branch Director (i.e. Operations). Allows for the evaluation and development of alternate learning pathways for T1 positions. 	<p>Pros:</p> <ul style="list-style-type: none"> Retaining the distinction between T1 and T2 IMT allows a more scalable response. 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 GACG 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 NASF, IAFC, ICACC, and several of the GACG-ACs. Time to implement will be significantly shorter since do not have to transition 24 (approx.) T2 IMTs to T1 level.
<p>Cons:</p> <ul style="list-style-type: none"> 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 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. 	<p>Cons:</p> <ul style="list-style-type: none"> 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 and IAFC) are opposed to this recommendation. Concern that recommendation will result in loss of GA control to assign local IMT for rapid response. 	<p>Cons:</p> <ul style="list-style-type: none"> 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 T1 Complex, T2 Extended, T3 Initial for wildland fire).
<p>Potential Risks and Cost Associated:</p> <ul style="list-style-type: none"> 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 51 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 attainment 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. 	<p>Potential Risks and Cost Associated:</p> <ul style="list-style-type: none"> 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 IMT's 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. 	<p>Potential Risks and Cost Associated:</p> <ul style="list-style-type: none"> 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.

Alternative Comparison Matrix

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

<p>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 Mob Guide to provide national wildland fire operations direction, prioritization, allocation, and oversight.</p> <ul style="list-style-type: none"> 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-GACC 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. 	<p>Original EIM Recommendation: Establish a national target 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.</p> <ul style="list-style-type: none"> Type 2 IMTs (other than those solely intended for state use) would be transitioned to T1 IMT to achieve the target number. 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. <p>NWCG has established guiding principle for IMT mobilization to maintain GACC autonomy as much as possible, with oversight from NMAC.</p> <ul style="list-style-type: none"> 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 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 unit’s IA and EA capabilities. Consider use of out-of-GACC IMTs for pre-positioning or planned replacements. 	<p>Revised EIM Recommendation: Request each GACG-AC conduct an analysis to support 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-AC would be responsible for developing recommendations and implementing measures to sustain their target number of IMTs.</p> <ul style="list-style-type: none"> The national target of T1 and T2 IMTs would be the aggregate of what each GACG-AC recommends and can support. Each GACG will have discretion to assign IMTs within their GA, however NMAC retains authority for oversight to ensure national IMT management objectives are met. NCSC continues to work with GACCs to evaluate changes to IMT rotations and mobilization to increase efficiency and help with IMT leveling. <ul style="list-style-type: none"> Expand a GA’s rotation to include IMTs in multiple GA’s (i.e. Rocky-Basin T1 rotation). 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 in low fire danger. 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 GACCs to share responsibility for managing IMT assignments.
<p>Pros:</p> <ul style="list-style-type: none"> 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 GACG 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 T3 organization. Retention of T2 IMTs allows for a more scalable response. 	<p>Pros:</p> <ul style="list-style-type: none"> Having fewer IMTs is expected to make it easier to staff and regularly exercise all IMTs. Creates 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. 	<p>Pros:</p> <ul style="list-style-type: none"> 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 agencies. NMAC would still 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 assignments nationwide. Leveling of 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. <ul style="list-style-type: none"> 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 tend to needs of their home unit.
<p>Cons:</p> <ul style="list-style-type: none"> 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 GACCs 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. 	<p>Cons:</p> <ul style="list-style-type: none"> 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. 	<p>Cons:</p> <ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> Local line officer (District Ranger, Field Office Manager, Refuge Manager, etc) would be the ideal liaison to interact with county commissioners, cooperating agencies, and stakeholders. Local FMO or AFMO could be assigned as a liaison to the IMT to provide assistance with local knowledge and tactics.
<p>Potential Risks and Cost Associated:</p> <ul style="list-style-type: none"> Requires a complex system of GA and Nat’l rotations for the T1 IMTs. 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 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. 	<p>Potential Risks and Cost Associated:</p> <ul style="list-style-type: none"> 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. 	<p>Potential Risks and Cost Associated:</p> <ul style="list-style-type: none"> 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.

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EIM Recommendation: Ensuring Sufficient IMT Participation

<p>Status Quo: IMT participation continues to be voluntary. The decision to participate is up to the employee, and requires supervisor or line officer approval.</p> <ul style="list-style-type: none"> Each GACG oversees the governance of IMT membership, recruitment, and selections. Approximately 70% of ICAP applicants are from federal agencies based on 2014 ICAP data: <ul style="list-style-type: none"> FS: 49.8% BIA: 1.1% BLM: 12.8% FWS: 2.5% NPS: 3.9% Approximately 30% of ICAP applicants are from state/county/local government agencies: <ul style="list-style-type: none"> States: 14.0% County/Local: 15.8% ADs account for approximately 18.5% of all ICAP applicants (national average). Approximately 75% of IMT assignments are ordered by federal agencies (84% if including FEMA) based on NICC 2004-2013 historical data. National percentages: <ul style="list-style-type: none"> FS: 56% BIA: 2% BLM: 13% FWS: 1% NPS: 3% FEMA: 9% 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): <ul style="list-style-type: none"> A T1 IMT was ordered 24% of the time A T2 IMT was ordered 76% of the time These percentages vary by Geographic Area. 	<p>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.</p> <ul style="list-style-type: none"> 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. <p>NWCG has proposed additional actions under EIM to address participation concerns:</p> <ul style="list-style-type: none"> 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. 	<p>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.</p> <ul style="list-style-type: none"> 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 NMAC. GA goals would be tiered from national goals/GA historic use, and overseen by the GACG-AC. Participation from state/county/local 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, 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 FMB and NWCG can take back to their agencies to address agency purview issues to increase participation levels. <ul style="list-style-type: none"> Agency expectations and high level support. Formal mentoring and career assistance programs. Increase number and use of virtual support positions as well as Service Centers. Compensation incentive measures. Establish performance measures. Need to balance target accomplishment with supporting large fires.
<p>Pros:</p> <ul style="list-style-type: none"> 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, recruitment, and prioritization. Many GA's have good working relationships with county/local govt agencies. ICAP applicants from county/local govt agencies make up 15.8% national average. 	<p>Pros:</p> <ul style="list-style-type: none"> Promote consistency among agencies and GAs. Establishes assurance measures to promote participation and reduce/eliminate barriers and disincentives. Defers to agency prerogative to manage their workforce succession in a coordinated manner. 	<p>Pros:</p> <ul style="list-style-type: none"> Continues emphasis on interagency IMT participation with support from all agencies. Creates strategic framework to address workforce succession concerns. Establishes actual workforce targets that agencies can develop strategies to support, monitor, and evaluate success. Quantifies the amount of support needed from member agencies to support IMTs and provides a tangible target to strive for.
<p>Cons:</p> <ul style="list-style-type: none"> 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 IA/EA responsibilities) 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. 	<p>Cons:</p> <ul style="list-style-type: none"> The technical challenges of some of these recommendations to reduce/eliminate barriers may be outside of even agency/dept purview. <ul style="list-style-type: none"> Relief on federal pay cap, establishing pay rates based on ICS position, P-code savings for DOI/state employees, etc. 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. 	<p>Cons:</p> <ul style="list-style-type: none"> Establishes a target that previously did not exist. Some agencies/geographic areas may have difficulty achieving targets. Would need to develop and address mechanism to ensure accountability. The technical challenges of some of these recommendations to reduce/eliminate barriers may be outside of even agency/dept purview. <ul style="list-style-type: none"> i.e. relief on federal pay cap, establishing pay rates based on ICS position, P-code savings for DOI/state employees, etc.
<p>Potential Risks and Costs Associated:</p> <ul style="list-style-type: none"> If the federal workforce continues to shrink, and/or workforce succession issues are not addressed, the state/county/local govt 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. 	<p>Potential Risks and Costs Associated:</p> <ul style="list-style-type: none"> 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. Requiring mandatory participation for all employees may have negative consequences and prove to be difficult to enforce. If barriers to participation are not addressed fed/state participation on IMTs will continue to decline. This would result in fewer IMTs or an even heavier reliance on ADs and local govt participation to fill the gap. 	<p>Potential Risks and Costs Associated:</p> <ul style="list-style-type: none"> 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 IMTs will continue to decline. This would result in fewer IMTs or an even heavier reliance on ADs and local govt participation to fill the gap.