

Date: September 17, 2014

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.

- 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.
 - 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).
 - 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.
 - 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

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Enclosures:

- EIM Alternative Comparison
- IMT Use by Agency Chart
- Agency Affiliation of 2014 IMT Applicants Chart