

Interagency Fire Program Management White Paper

8/19/05

Background:

On October 1, 2004, Chief Dale Bosworth directed Fire and Aviation Management to implement Interagency Fire Program Management (IFPM). The Chief's policy letter was the culmination of an extensive Interagency effort to address deficiencies identified after the South Canyon Fire and supported by the 1995 Interagency Management Review Team (IMRT). Between 1995 and 2004, significant work was completed to assist in the implementation of IFPM. During those efforts 14 key positions were identified. Some position standards were determined through compromise by interagency members representing fire management, subject matter experts, and Human Resources.

The IFPM standards include Office of Personnel Management (OPM) Qualification Standard Requirements, Specialized Experience Requirements, NWCG Incident Management Qualifications, and additional Required Training.

The National Fire and Aviation Executive Board (NFAEB), through the Federal Fire Training Task Group (FFTTG) chartered the interagency IFPM Implementation Team. In response to several recent concerns, the Implementation Team has reviewed many suggestions. As of this date, the Implementation Team has sent several suggestions to the FFTTG for review and submission to the NFAEB. The NFAEB has the authority to make IFPM implementation clarifications and standards changes on behalf of the Departments of Interior and Agriculture.

Issues:

- Potential Agency and Personal Liability: This issue is about an early statement on the employee notification that led to the perception that all individuals in a current IFPM position that do not currently meet all standards are unqualified and it places them in a position of increased liability. Recently the NFAEB sent out a clarification memo that addressed this liability issue. The memo said, *“earlier memorandum has caused concern and misunderstanding for some employees and supervisors who have understood this to mean that they are “unqualified” to be in their present position, or that they are “unqualified” to be placed into one of the standard interagency key fire management position descriptions. Neither of these concerns is valid. Employees are qualified for their present positions because they were required to meet the Office of Personnel Management (OPM) qualification standards at the time they were placed into their current position. The Incumbent Memo states that an employee may need additional training and development opportunities to meet the requirements for the IFPM Standard and has until October 1, 2009, to meet these requirements.”*
- NWCG Position Requirements: During the development of the IFPM Standard, a group of Subject Matter Experts (SME's) identified the NWCG Incident Management Qualifications for each of the 14 key fire management positions. Since IFPM was adopted on October 1, 2004, several qualification questions have been identified, reviewed, and adjusted. Among these adopted changes are:

- Position qualification requirement change from RXB1 or FUMA to RXB2.
- Position qualification requirement change from RXM2 to RXB2.
- Some additional training requirements have been dropped for the Center Manager position.

In addition, the Implementation Team is pursuing a recommendation that instead of ICT5 **and** FFT1 be required for some positions that it be ICT5 **or** FFT1.

- NWCG Position Qualifications: IFPM does not affect qualifications for incident command system (ICS) positions. Employees are qualified for the ICS command system positions that are on their current qualifications card. Qualifications for incident management positions are determined by the Wildland and Prescribed Fire Qualification System Guide, PMS 310-1 and the Fire and Aviation Management Qualifications Handbook (FSH 5109.17).
- Undocumented Qualifications - “Grandfathering”: The Departments of Agriculture and Interior human resource offices and OPM will not approve any “grandfathering” to meet the IFPM Standard. The Forest Service Handbook 5109.17 defines Grandfathering as “*Linking unrecognized or uncertified position experience and/or training together to establish a qualification. There is no “grandfathering allowed for any position contained in the Handbook, FSH 5109.17.”*” There is a long history of pressing the grandfathering issue, but it always becomes apparent that it is a subjective judgment as to whether the person is qualified if they have not met and documented adopted standards. This leads to other individuals calling into question those subjective decisions – “if them, why not me?” In addition, the Union has worked diligently to eliminate these types of subjective decisions.
- Resolution Board: Appendix A of the IFPM Standard Implementation Plan outlines the responsibilities of the Resolutions Board which was established to:
 - Review and decide on cases in which employees do not meet the IFPM *Standard* qualification, but believe their education and experience constitute adequate position qualification or their lack of qualification was beyond their control.
 - Review and decide on requests for extensions beyond the 10/1/2009 implementation completion date.

The Board charter was approved and members have been selected. The process for submitting packages for review is contained within the Implementation Plan. There have been no packages submitted to the Board as of this date. In addition, individuals currently have the opportunity to forward resolution related questions to agency IFPM Human Resources or Fire representatives.

- Positions List: The NFAEB has the authority to determine whether key positions should be dropped or added. Thus far, there have been no additions or deletions.

- Implementation Costs: The agencies are independently determining how they will address IFPM implementation funding. In addition, some “guidance” is being developed by the Forest Service in order to address training priorities. This advice will be part of a Forest Qualifications Review Committee (FQRC) Guide that is now in final draft. The presuppression budget has some flexibility in accommodating increased training needs, but the primary controlling factor will be better local assessment and support of candidates in key ICS and IFPM positions that have a history of solid performance and a high level of availability.
- Equity Issues: During this initial implementation phase, it is important to focus on the incumbents in the 14 key positions as priority candidates for both NWCG qualifications and additional education requirements. Agencies and managers are responsible for equitable support of training and education needs. However, this has always been a responsibility of the agencies and managers (Also see Implementation Costs).
- Individual Development Plan (IDP): The implementation time frame for completion of IDPs has passed (June 30, 2005). IDPs are a portion of the process for helping employees determine their career path and the next logical position they should work toward. IDPs must be completed for FY 2005 with the IFPM training requirements to meet the timeline issued in the IFPM Implementation Plan.
- Implementation Time Frames: The five-year time frame for IFPM implementation was agreed to by the Departments of the Interior and Agriculture in the Interagency Fire Program Management Standards and Guide White Paper (5/24/2004). This time frame was established by the Chief in the IFPM implementation letter of October 1, 2004. This time frame is intended to generate focus, commitment, and motivation to move toward the goals set by the Departments. Lack of resolve to follow the timelines is contradictory to direction set forth in the Chief’s policy letter. It may also place managers and supervisors that are not pursuing implementation in a position of conflict with individuals who are attempting to follow agency policy.

There have been comments that the completion date of October 1, 2009, for implementation does not allow enough time for individuals to achieve qualifications. Recent comments recognize timelines that were submitted for career development and based on no previous qualification. It is difficult to understand how anyone in the 14 key positions could have qualified for their current position and still be over five years away from some of the basic qualifications set forth in IFPM. As an example, the figure identified for total development of a Senior Firefighter was 3.18 years. Forty-six percent of all Forest Service IFPM positions are Senior Firefighters. Based on these figures and that the IFPM Implementation Team is currently attempting to moderate standards

for this position (see NWCG Position Requirements), it is hard to understand how the time frame is inadequate.

- Accident Review Oversight : The fire agencies have continued to come under increased scrutiny when fatalities have occurred. The Occupational Safety and Health Administration (OSHA), The Office of Inspector General (OIG) and Congress continue to track our progress on accident review board recommendations. Several recommendations from the Storm King fatalities are still unresolved and any further delays are considered by those in oversight positions to be intolerable. In addition, recent and pending judgments against individuals on or associated with the Cramer Incident fatalities have increased our need to be responsive and implement solutions.

- Incremental Change and Loss of Consistency: There has been some concern that NFAEB changes will generate a loss of consistency in the program. There are basically two ways to implement a program. The first is to stop the implementation process when concerns or issues arise, the second is to remain flexible and maintain a process for addressing change. The latter process has been selected because it has proven to be the most successful in addressing timely issues that cannot be anticipated and meeting the originally agreed upon time lines. All of the changes approved by NFAEB have been beneficial to our employees and moved the program toward agency goals. Based on concerns, several changes have occurred. Among those that have or are being addressed are:
 - Identification of Agency options for dealing with employees that do not meet the IFPM Standards by October 1, 2009;
 - IFPM Resolutions Board time frames;
 - The hiring of temporary employee;
 - Senior Firefighter and other position NWCG qualifications;
 - The length of time requirement for positions that require previous wildland firefighting experience.

- 401 Education Requirements: There are questions about the merit of pursuing professionalism through the educational qualification for the 401 series. It is broadly believed that pursuit of natural resource related courses will enhance the abilities of our employees to analyze critical data and make and communicate better decisions.

Leadership has worked on fire professionalization for many years and the Office of Personnel Management denied a request for a specific professional fire series but has allowed a broader interpretation of what courses contribute to 401 qualifications. Recently the IFPM Implementation Team posted information that is to be used by Human Resources when evaluating qualifying college education. These qualification criteria, which were developed by an interagency group of

Human Resources and Fire Management representatives, are significantly broader than previous 401 standards.

- Value of IFPM: There are questions about the value of IFPM for incumbents. The implementation process provides flexibility for incumbents with less than five years left in their career to stay in their positions and not seek IFPM standards. There are also cases where the Resolution Board process may determine alternative time lines (also see Undocumented qualifications - "Grandfathering").
- Prescriptive Process: Comments have been made that IFPM is overly prescriptive. When new policy is implemented, and guidance is provided, there are those that say we need more flexibility to interpret and deal with the policy and guidance. Others say that the policy and guidance is overly general and needs to be expanded to eliminate interpretations. Although someone has made such comments about IFPM, this is a universal problem and there will never be a point at which everyone is satisfied. IFPM has built-in safeguards, many checks and balances, and flexibility. This is as much as any program can expect.
- Safety Concerns: Concerns have been voiced that "safety could be diluted while focusing on natural resource academic proficiency." There are impacts to individuals and the agency associated with the standards set within IFPM. Individuals will be taken away from their duties as they are with any training or fire assignment. However, managers always have the responsibility to preserve safety first and foremost. If there were ever to be a circumstance where safety was diluted because of the pursuit of IFPM goals, it would almost certainly be due to individual performance issues and not because of the program. After all, the IFPM program is attempting to expand skills, experience, and knowledge that are intended to increase, not decrease safety.

Fast-track training has also been mentioned as a concern. There will be individuals that will feel the strain of additional training or assignments, but the program and the October 1, 2009, deadline has been adopted as a reasonable deadline and is not based on a need for fast-tracking. If an individual is perceived by their home unit to be extending themselves, this should be addressed immediately and if not caught at that point, it should be addressed upon annual or semi-annual review of their Individual Development Plan, (also see Implementation Time Frames)

The implementation of IFPM was based on the organizational inconsistencies that were identified after the 14 fatalities on Storm King Mountain. Many believe that these organizational inconsistencies contributed to those fatalities. It was almost 10 years from this incident until the implementation of IFPM. There are many fire and aviation employees that have embraced this effort and there are some who have not. There is nothing wrong with those who question the program or implementation process. Those that challenge the process can contribute to making the program stronger and increase the

resolve of those dedicated to the process. However, challenging the value, the schedule, the legality of the process can be unproductive since these issues have been analyzed for many years by many of our brightest employees.

Chief Dale Bosworth and Fire Director Tom Harbour continue to pledge their support for the implementation of IFPM. They see that our obligation to implement this program is a key step in moving our organization to a higher level.