



IWDG Memorandum 24-01

22 February 2024

TO: Dave Haston, Chair, National Multi-Agency Coordinating Group
FROM: Jesse Bender, Chair, Incident Workforce Development Group
SUBJECT: IWDG Response to NMAC L2023-002: Tasking – Increasing Incident Support Capabilities

Tasking

In March 2023, NMAC issued a tasking seeking multiple recommendations for increasing incident support capabilities for wildland fires. This response applies to only a portion of the tasking, specifically to the request for:

3. Options for increasing wildland fire incident management support that utilize non-traditional or other agencies/organizations (e.g., establishing agreements with other federal agencies to provide procurement/buying team support, ICS personnel, information technology services, etc.).

Narrative

IWDG established a task team to evaluate the elements of the tasking, confer with subject matter experts, and provide a written recommendation. The complete recommendation was reviewed and approved by the entirety of IWDG prior to submission. The task team identified 30 agencies and organizations that either have response/support capability but do not currently participate in interagency wildland fire response or who have additional resources that are under-utilized organizationally. The attached spreadsheet contains information on all 30. In addition to the increased individual partnership opportunities identified in the attachment, below are IWDG's large-scale recommendations for focus by NMAC, FMB, and NWCG.

IWDG is sensitive to perceptions that efforts to build external capacity could seem contrary to investments in existing workforce. Governance groups should emphasize efforts to recruit and retain current employees and IMT members in addition to undertaking new taskings to increase capacity.

Findings and Recommendations

Consistent thematic barriers identified by the 30 identified agencies/organizations are qualifications, agreements, systems, and communications.

Qualifications: multiple and differing qualifications systems, particularly ones that do not fully utilize NWCG standards, including all hazards qualifications systems.

- Additional flexibility is needed regarding qualifications to reduce barriers and remove roadblocks, recognize partner systems and qualifications, and provide alternative pathways to qualification without compromising the quality of resources and standards.
 - Review pathways to Incident Commander (IC) qualification to align with all-hazards IC qualifications to view functional capacity as a specialty and IC as a leadership position.

The Incident Workforce Development Group (IWDG) is jointly chartered by the National Multi-Agency Coordinating Group (NMAC), the National Wildfire Coordinating Group (NWCG) Executive Board, and the Fire Management Board (FMB) to provide national leadership to enable long-term development and sustainability of a national interagency incident workforce.

- Currently, all-hazard ICs follow the path through each IC level to achieve qualifications at each subsequent complexity level. NWCG qualifications require the addition of functional qualifications prior to reaching the Complex level (previously required at Type 2 level, then an IC could progress to Type 1 without additional functional experience or qualification).
- Adopt standards currently held by other organizations, to include NFPA standards.
- Identify means for qualification aside from the position task book system, including Recognition of Prior Learning (RPL).
- Outside entities are pursuing ability to certify qualifications, rather than only through state and federal agencies. The Incident Management Team Association (IMTA), specifically, is in process of building staff and organization to support credentialing. Support and coordinate with IMTA and others to enable single-source credentialing of non-federal personnel.
- Capitalize on use of and improve existing alternative qualifications pathways, including but not limited to:
 - *NWCG Standards for Recognition of Prior Learning (RPL)*, PMS 309,
 - NWCG Endorsements, and
 - NFPA Crosswalk and Gap courses.

Agreements: existing agreements and/or methods of reimbursement for individuals and their sponsoring/employment agencies discourage participation.

- The types of agreements and statutes that allow agencies to participate in response are variable and originate from local to congressional levels. The understanding and utilization of these agreements and statutes is also variable.
 - Education on the opportunities and limitations of current agreements and statutes is needed.
 - Identify best practices and agency points of contact for navigating agreements to reduce the confusion and labor necessary for smaller agencies and cooperators to benefit from them.
- While numerous entities can mobilize under Stafford Act authority, this applies inequitably to wildland fire response compared to other disasters. Agreements are generally tied to authorities, some of which are many years old and not fully supporting current situations and response needs.
 - Ensure Master Coop Agreement is applied equitably by states/agencies.
 - Nearly all agencies are increasing fuels reduction work, including application of prescribed fire, but not all agencies utilize the agreement for prescribed fire resources.
- Administratively Determined (AD) authority is one hiring method used to hire full-time state or local employees due to employment or agreement requirements under certain circumstances. This creates conflict for the restricted use of ADs for some positions and duties on incidents.
 - Create categorization for AD hiring that accurately reflects the personnel employment status.
 - Consider development of a national-level AD hiring program to support smaller agencies/organizations who lack the staff to support mobilization of ADs, especially of IMT support personnel.
 - Evaluate and determine the feasibility of a reservist program such as the one operated by FEMA where personnel apply to participate and complete hiring paperwork up front to speed the process of mobilization when needed and protect their current job status.
- The federal agencies currently lack grants and agreements personnel to assist in developing and finalizing agreements with entities.
 - Identify partner agencies who can assist with federal grants and agreements while also increasing recruitment of personnel to fill these critical positions.

Systems: limited access to systems utilized in wildland fire qualification and mobilization.

- Although interoperable systems are in place, access to all systems is inequitable, resulting in similar systems held within single/few agencies. This also results in inconsistent data representation from the competing systems, leading to both under- and over-representation depending upon the query.
 - Reduce variance between similar systems to eliminate duplicity and combine resources.
 - Where duplications exist between wildland fire and all-hazard systems, combine to utilize a single system for both.
 - Fund systems and access through licenses from executive levels to avoid perceived discrimination against the smaller entities who can't independently support the costs.
- Compact authority allows access to resources, with a compact module in IROC to support the mobilization tracking, but compacts have been underutilized in non-traditional circumstances.
 - Leverage state compacts for hiring when other options are not feasible to ensure intergovernmental representation in mobilizations, including for international support.

Communications: insufficient communications to target audiences on new processes and revised standards for qualifications.

- Individual agency and organization decisions occur within silos but have impacts to one another. NWCG represents the common ground for most of these decisions and standards for wildland fire. FEMA represents the common ground between wildland fire and all hazards. However, smaller entities within both continue to express lack of understanding and inclusion in the large system.
 - Include representatives on geographic area coordinating groups that do not currently have them.
 - Include International Association of Fire Chiefs (IAFC) as liaison at NMAC.

Recommendations

The following recommendations are presented in priority order, based on the estimated potential value and ability to accomplish:

- Formalize a place in geographic rotations and thereby the national rotation for surge capacity IMTs from non-traditional sources and create a process for including them based upon availability.
- Integrate state and local agencies into all oversight groups, as appropriate, to ensure consideration of their resource capabilities.
- Establish secretarial-level agreements for DOI and USDA to ensure employees of all agencies under each department can respond to wildland fire and all-hazard incidents and receive payment.
- Further research opportunities to work with General Services Administration (GSA) to engage their personnel in wildland fire response and improve access to breadth of services they have available.
- Increase utilization of existing alternative qualifications pathways through communications and targeted outreach at conferences, meetings, symposiums, and other group events delivered by personnel who have successfully utilized the pathways.
- Review processes and endorsements for wildland fire positions to crossover to all-hazards qualifications.
- Review the *NWCG Standards for Recognition of Prior Learning (RPL)*, PMS 309, for updates that reduce administrative workload and provide standard acknowledgement of appropriate actions.
 - Consider utilizing NASF Fire Committee, IAFC Wildland Fire Policy Committee, and other standing bodies to provide input on the changes.

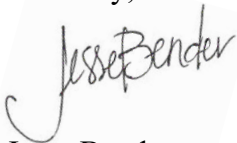
- Issue agency-level direction to increase use of RPL for employees by developing interagency RPL process at the field-level.
- Explore AD hiring options that leverage framework of the FEMA Reservist program, qualify personnel through a single authority, and differentiate state/local hires from other casual hires.
- Evaluate application of the Stafford Act and use of the Master Cooperative Agreement to ensure consistent usage and application of the authority. While it would require extensive external support and effort to make changes, the cascading impacts would have far-reaching impact to the agreements and existing opportunities that would be more valuable than many other smaller scale efforts could achieve.

Closing

None of the recommendations resulting from this tasking are small and most require interdependent effort by multiple governance bodies and agencies. They require a concerted effort and external support. IWDG recommends NMAC coordinate with the Fire Management Board (FMB) and NWCG Executive Board to establish a task team of intergovernmental representatives who can review these recommendations, assign them to authoritative bodies or agencies, and ensure successful coordination and implementation of any of these efforts, to guide agreements and connections between agencies and organizations, to ensure consistency along with policy compliance, and to facilitate communications, particularly on initiatives that cross oversight group boundaries. Continued IWDG representation in the next steps is equally imperative.

Questions may be directed to IWDG task team members Zeph Cunningham, Dave Celino, Jesse Bender, or Rich Harvey.

Sincerely,



Jesse Bender
Chair, IWDG

CC: Sarah Fisher, Chair, Fire Management Board
Aitor Bidaburu, Chair, NWCG Executive Board

Attachments: NMAC L2023-02_3_Non-Traditional Agency and Organization Recommendation Tracker