



Memorandum

To: Fire Management Board (FMB)
National Wildfire Coordinating Group (NWCG)
National Multi-Agency Coordinating Group (NMAC)

From: Jeffery R. Rupert
Director, Office of Wildland Fire

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Subject: Support for the Complex Incident Management Action Plan

Background:

For the past decade, a number of engagements have been undertaken to address incident responder workforce development, Incident Management Team (IMT) use and availability, and fatigue management. These efforts have attempted to address the following:

- reduced number of IMT participants to fill IMT rosters, impacting the total number of IMTs available nationally;
- inconsistent use of IMTs due to lack of national IMT rotation management and commitment approval;
- reliance on Administratively Determined (AD) employees, retirees, and cooperators to staff IMTs without commensurate trainee use; and
- standardized IMT mobilization processes and other criteria across Geographic Areas.

Despite these reform efforts, IMT administrative challenges persist. As evidenced over the past two fire years, there have been challenges meeting IMT demand during high tempo periods. The number of available IMTs is projected to diminish in the future and action must be taken immediately. Nationally, there are 16 Type 1 IMTs jointly managed by the NMAC and the Geographic Areas and 33 Type 2 IMTs managed by the Geographic Areas. These IMTs have two roster configurations: a short roster consisting of Command and General Staff (C&G) positions augmented with a few critical positions (20 positions plus 6 trainees), and a long roster (44 positions plus 14 trainees). Once committed to the roster, these personnel are expected to prioritize their availability to the IMT assigned/selected to. Only through concurrence of their Incident Commander & Supervisor will they support other priority active incidents. In many cases, Incident Commanders (ICs) further negotiate additional IMT roster positions when mobilized, increasing the rosters to 80 personnel prior to arrival at the incident.

Geographic Coordination Groups also utilize differing criteria/methodology for IMT rotation and availability, resource availability/drawdown levels, and determination of Preparedness Level (PL). These criteria and methodology are independently and arbitrarily determined by each Geographic Area and often result in conflicting direction or operating procedures, further compounding challenges.

Recommended actions to address these issues (referred to as Complex Incident Management Teams [CIMTs]) are proposed by the Incident Workforce Development Group (IWDG), a working group of IMT practitioners and subject matter experts jointly chartered by the Fire Management Board (FMB), the National Wildfire Coordinating Group (NWCG), and the National Multi-Agency Coordinating Group (NMAC). The IWDG proposal includes a number of immediate actions and additional longer-term solutions, all supported by the FMB, NWCG, and NMAC. These actions must be taken in coordination with key stakeholder groups, including NWCG committees and the Coordinating Group Advisory Council (CGAC), to ensure the decisions and actions meet the needs of those most engaged in the development and oversight of IMTs.

IWDG Proposed Actions:

1. Craft and disseminate information and key messages about this transformation to agency leadership, line officers, and fire managers. Key messages should include not only the what and how, but also the why, and strong messaging about appropriate use of IMTs in the future.
 - a. Responsibility: FMB.
 - b. Due Date: February 2022
 - c. Benefits: More effective and efficient use of limited number of IMTs and suppression resources.
2. Establish agreements with non-fire federal agencies and non-federal entities to provide methods for payment to employees while working on IMTs and federal wildland fires.
 - a. Responsibility: FMB.
 - b. Due Date: December 2023
 - c. Benefits: increase available personnel for CIMT and wildland fire assignments, reduce current administrative barriers to participation, and provide improved means for payment compensation without necessitating the use of leave to accept fire assignments.
3. Establish standardized Preparedness Level criteria, drawdown levels, IMT operating procedures, and other operating plans for all Geographic Areas.
 - a. Responsibility: NMAC.
 - b. Due Date: January 2023.
 - c. Benefits: universal criteria/plans applied to resource availability, mobilization, situation descriptors, and IMT operating procedures and standardized use of those criteria will increase efficiency, facilitate movement of IMTs and national resources, and clarify internal and external messaging. It also supports the national IMT rotation.
4. Combine Type 2 qualifications and Type 1 qualifications (and subsequently IMTs) into a single qualification level (and single, scalable IMT type).
 - a. Responsibility: NWCG for qualifications, NMAC for IMT typing.
 - b. Due Date: January 2024.
 - c. Benefits: reduce redundancy and overlap in the qualification and coordination systems, provide the highest level of expertise for incident management, reduce time and cost to qualification, and allow for single-point IMT management at the highest level.
5. Establish IMT standards which reflect team capability and support evolving and devolving incidents.

- a. Responsibility: NWCG, with additional support from US Fire Administration (USFA).
 - b. Due Date: January 2024.
 - c. Benefits: established IMT standards which allow for a team to operate within an increasing and decreasing complexity environment will create a safer, less confusing work environment for firefighting and support personnel, improve efficiency, and reduce incident cost through reduced team transitions and the IMT ability to adjust strategy and tactics, including size of organization, to align with incident priorities.
6. Establish a single national IMT rotation based on the current national Type 1 IMT rotation (Geographic Area rotation for closest forces, and true national rotation, augmented with a requirement that Geographic Areas may only internally commit any IMT twice in a calendar year without NMAC approval).
- a. Responsibility: NMAC.
 - b. Due Date: January 2024.
 - c. Benefits: ability to equitably assign IMTs nationally to address fatigue and over/under-utilization. Reduce complexity in the coordination system and remove ability for individual units at the ground level to control the national IMT system.

Next steps:

FEC concurs with the IWDG CIMT: Action Plan for Implementation and requests the FMB, NWCG, and NMAC support and appropriately task the proposed actions and their ancillary implementation requirements.

To further these efforts, FEC will:

- Request an agenda topic to brief WFLC;
- Request a joint letter from Department of Interior and U.S. Forest Service on the intent and the need for this change to pertinent national, state/regional, and local level fire managers and agency administrators to ensure success.
- Provide periodic briefings on progress and barriers to WFLC.

Continue to brief FEC on the progress of these actions and their supporting components.

Contact: Jesse Bender, Chair, Incident Workforce Development Group (IWDG)