



National Wildfire Coordinating Group Incident and Position Standards Committee

IPSC-2025-05

Date: 06/06/2025
To: Aitor Bidaburu, Chair, NWCG Executive Board
From: Michael Froelich, Chair, Incident and Position Standards Committee
Subject: Alternate Pathways to Incident Commander Complex (ICCI)

Purpose: This memorandum outlines the Incident and Position Standards Committee (IPSC) member agency positions on an alternate pathway to Incident Commander Complex (ICCI), stewarded by the Incident Command Subcommittee (ICSC).

Issue: ICSC approached IPSC with multiple recommendations for alternate pathways to ICCI. IPSC was unable to reach consensus on any option, therefore IPSC is requesting that the NWCG Executive Board come to a decision on a qualification pathway for ICCI.

Background: Since December 2023, ICSC and IPSC have explored alternate pathways to ICCI. In December 2024, IPSC presented this topic forward for a vote, during which one agency requested statistical data to support the decision. In that vote, National Association of State Foresters (NASF), International Association of Fire Chiefs (IAFC), Bureau of Land Management (BLM), Bureau of Indian Affairs (BIA), and Fish and Wildlife Service (FWS) supported Option 3, while the National Park Service (NPS) opposed it and requested additional data, and the US Forest Service (USFS) voted to keep the current position qualification pathway, Option 4. To address the data request, IPSC consulted the Incident Workforce Development Group (IWDG), which provided the necessary statistical data in January 2025. IPSC reviewed this data during the in-person meeting in April 2025.

During the April 2025 meeting, IPSC also reviewed the National Integration Management System (NIMS) National Qualification System (NQS) all-hazard endorsement for Incident Commander Type 1 (ICT1). The NIMS Integration Committee endorsement requires that an individual qualified as an ICT1 under NQS can assume the role of ICT1 for wildland fire incidents by completing the following requirements: S-520, Advanced Incident Management or Complex Incident Management Course (CIMC); RT-130, Wildland Fire Safety Training Annual Refresher; and demonstrating successful performance as an ICT1 on a wildland fire incident (no NWCG PTB completion requirement).

In May 2025, IPSC voted for the second time referencing the information previously discussed but again could not reach consensus. NASF, IAFC, USFWS, BIA, NPS, and BLM supported Option 3, while USFS supported Option 4.

Option 1: Alternate Pathway (Non-ICT3):

Required Training

- ICS-400, Advanced ICS for Command and General Staff
- RT-130, Wildland Fire Safety Training Annual Refresher (WFSTAR)
- S-420, Command and General Staff OR L-481, Advanced Leadership for Command and General Staff OR O-305, Type 3 All-Hazard Incident Management Team
- S-520, Advanced Incident Management OR Complex Incident Management Course (CIMC)

Required Experience

- Satisfactory performance fulfilling the role of an Incident Commander Complex Deputy (ICCD)

AND

- Satisfactory performance as an Operations Section Chief Complex/Type 2 (OSCC/2), Safety Officer Complex/Type 2 (SOFC/2), Logistics Section Chief Complex/Type 2 (LSCC/2), Plans Section Chief Complex/Type 2 (PSCC/2), OR Finance/Administration Section Chief Complex/Type 2 (FSCC/2)

AND

- Completion and Certification of NWCG Incident Commander Complex (ICCI) Position Task Book, PMS 311-101

Option 2: Utilize One (Non-ICT3) Pathway

Required Training

- ICS-400, Advanced ICS for Command and General Staff
- RT-130, Wildland Fire Safety Training Annual Refresher (WFSTAR)
- S-420, Command and General Staff OR L-481, Advanced Leadership for Command and General Staff OR O-305, Type 3 All-Hazard Incident Management Team
- S-520, Advanced Incident Management OR Complex Incident Management Course (CIMC)

Required Experience

- Satisfactory performance as an (OSCC/2), (SOFC/2), (LSCC/2), (PSCC/2), OR (FSCC/2)

AND

- Completion and Certification of NWCG Incident Commander Complex (ICCI) Position Task Book, PMS 311-101

Option 3: Utilize One (Non-ICT3) or ICT3 Pathway

Required Training

- ICS-400, Advanced ICS for Command and General Staff
- RT-130, Wildland Fire Safety Training Annual Refresher (WFSTAR)
- S-420, Command and General Staff OR L-481, Advanced Leadership for Command and General Staff OR O-305, Type 3 All-Hazard Incident Management Team
- S-520, Advanced Incident Management OR Complex Incident Management Course (CIMC)

Required Experience

- Satisfactory performance as an (OSCC/2), (SOFC/2), (LSCC/2), (PSCC/2), (FSCC/2), OR ICT3

AND

- Completion and Certification of NWCG Incident Commander Complex (ICCI) Position Task Book, PMS 311-101

Option 4: Current Pathway Only

Required Training

- ICS-400, Advanced ICS for Command and General Staff
- RT-130, Wildland Fire Safety Training Annual Refresher (WFSTAR)
- S-420, Command and General Staff OR L-481, Advanced Leadership for Command and General Staff OR O-305, Type 3 All-Hazard Incident Management Team
- S-520, Advanced Incident Management OR Complex Incident Management Course (CIMC)

Required Experience

- Satisfactory performance as an Incident Commander Type 2 (ICT2)

OR

- Satisfactory performance as an Incident Commander Type 3 (ICT3)

AND

- Satisfactory performance as an (OSCC/2), (SOFC/2), (LSCC/2), (PSCC/2), OR (FSCC/2)

AND

- Completion and Certification of NWCG Incident Commander Complex (ICCI) Position Task Book, PMS 311-101