Exhibit 9 - Recommendations

The assessment team identified 21 recommendations to improve the NWFF workforce. Each recommendation is associated with a finding from the study and the justification for why the recommendation should be implemented.

1) Pause all agency specific and interagency workforce initiatives.

Finding - The NWFF Workforce Assessment Team identified at least 27 groups working on workforce initiatives for agency specific and the interagency wildland fire community, and assumes others are unknown to the team.

Recommendation - Pause all NWFF workforce development initiatives, both agency-specific and interagency. Each team should report in their progress to an interagency work group. That interagency work group should then work with leadership to develop clear governance to ensure consistency, efficiency, and transparency of all initiatives for the NWFF community. Once governance developed, the group should ensure that the governance and management direction is disseminated back to each work group prior to restart.

Justification - This number of simultaneous efforts could result in inconsistent data causing duplicative and conflicting information and recommendations. Conflicting information and recommendations will result in added time and money associated with resolving the inconsistencies. In addition, the same information sources may be contacted, causing inefficiencies and frustration. As a result, the agencies are not maximizing those resources.

2) Develop a standard operating practice of conducting NWFF workforce analysis on an interagency level and on a recurring basis.

Finding - The analysis conducted for this assessment was highly detailed but also highly cumbersome. A standard methodology of systematically evaluating the NWFF workforce with regard to organizational structure, workforce demographics, population trends, and forecasts needs to be developed and implemented for the wildland firefighting agencies.

Recommendation - Convene an interagency task force to develop a standard operating practice and methods of conducting workforce analysis on an interagency level and on a recurring basis.

Justification - Fundamental truth that wildland fire agencies cannot meet the firefighting mission if they do not have the workforce to do it. If a long term workforce succession plan is not in place, the NWFF community cannot guarantee that agencies will have the personnel to effectively accomplish the mission in the future. Without a method of conducting workforce analysis, a workforce succession plan has little chance of being effective in the long-term.

3) Develop a method to seamlessly obtain data (e.g., HRM, Financial, Training, etc.) to conduct workforce analysis on an interagency level.

Finding - The team was challenged to identify sources of data for this assessment. Once identified, the team spent an extensive amount of time and resources both seeking the
ability of obtaining the correct data and synthesizing data between various information systems. Very few of the systems holding the necessary data interfaced with one another.

**Recommendation** - Convene an interagency task force to evaluate and implement methods of seamlessly obtaining data required to conduct a comprehensive NWFF workforce analysis on an interagency level.

**Justification** - The availability of data and time associated with obtaining the data handicapped the speed with which the assessment team could progress. If data barriers were removed, the assessment team would have been able to perform a much more efficient analysis of the NWFF workforce.

4) **Standardize Fire Management Officer (FMO) position descriptions in the FS and implement their usage consistently across the organization.**

**Finding** - In FS, FMO is a title used organizationally but not consistently used as an official title in human resources management (HRM) systems. Within the FS fire nomenclature, Fire Management Officer (FMO) is the title used almost universally when describing the fire program management lead at the District, Zone, and Forest organizational levels. The FMO position is perhaps the singular most critical position within the fire management organization. The assessment found that the official HRM position title and/or working title for individuals working in these positions varied significantly across the Agency Position Descriptions. Subsequent titles ranged from Forest Technician to Biologist and often do not contain FMO in either the position or working title. Several issues have an opportunity to present themselves as a result including:

- Inconsistency in position descriptions
- Inconsistency in performance expectations
- Inconsistency in job selection criteria
- Inconsistency in grade levels across similar units
- Difficulty for groups working on Agency workforce planning and employee development initiatives to analyze data and develop gap or trend analyses.

The critical nature of the FMO position underscores the need to focus attention and priority on this position.

**Recommendation** - The FS should ensure that position description standardization be completed for the FMO position within the organization. In addition, all persons occupying these positions should be formally placed in the associated and appropriate Standard Position Description and HRM records should be updated. This should be accomplished for persons currently encumbering the positions as well as all future position vacancies.

In addition the FS should complete the Office of Inspector General recommendations concerning the workforce and succession planning specific to the use of the professional 401 series. Efforts have already been taken by the FS towards standardizing fire position descriptions including the different organizational level fire management officers. This work will be completed within the next few months and includes standardizing the position title as well as the working title.

**Justification** - The FMO position is typically responsible for all facets of fire program management for their unit. These responsibilities include firefighter safety oversight, budget
planning, environmental impact analyses, staffing decisions, emergency response activity, dispatch and coordination of resources, project planning, training, and workforce development to name just a few. In short, overall success of a unit’s fire program's ability to implement Interagency Federal Fire Policy and Agency Strategic Plan relies heavily upon having highly skilled and trained employees in these positions who are measured against a common standard for both job selection and performance, and who are compensated consistently across similar units. In addition, agency workforce planning and development groups need to have readily available demographics and data on which to base investment strategies for this critical segment of the fire management workforce.

5) **Evaluate the positions with Fire Program Management responsibilities across the wildland fire agencies to develop a method of identifying and documenting the roles these positions play within the NWFF workforce.**

**Finding** - The positions included in Fire Program Management are not consistent across the wildland fire community. The differences in positions within the Fire Program Management workforce makes it difficult for the NWFF community to conduct workforce management.

**Recommendation** - The NWFF Community should develop a method of identifying and documenting the positions performing Fire Program Management responsibilities for each wildland fire agency.

**Justification** – Implementation of the IFPM qualifications was a necessary first step towards the transparency and visibility needed to ensure consistent and effective wildland fire training and operations. While the other Fire Program Management positions identified within this assessment may not need standardized across the different organizations, a clear distinction of the role each position plays within their respective agency’s wildland fire program would strengthen the understanding of each program across the NWFF community.

6) **Develop a method of identifying all positions within the interagency fire workforce that are covered by the 6c benefit at the corporate level.**

**Finding** - The assessment team attempted to identify a detailed listing of all of the positions, both encumbered and vacant, within the NWFF community covered by the 6c retirement benefit, but was unable to locate a listing for either agency. A listing of the approved position descriptions covered by the 6c retirement benefit for the DOI can be found on the Fire and Law Enforcement Retirement Team’s R17 website, but the quantity and location of these positions in the current organizations could not be determined. As a result, all workforce analysis with regard to employees in the 6c retirement benefit assumes that the positions held by those employees are also covered by the benefit. Data analysis is unable to account for positions that are covered by the 6c benefit but are held by employees who do not meet the eligibility requirements.
**Recommendation** - Convene an interagency workgroup to identify what positions are covered by the 6c benefit within the interagency fire workforce at the global corporate level. The group should determine how the positions should be identified and documented within existing agency personnel systems. The documentation must be maintained to have a reliable and consistent data system that enables timely and accurate analysis by quantity and location of what positions are covered by the benefit, how many positions are encumbered by employees covered by the benefit, how many positions are encumbered by employees not covered by the benefit, and how many positions are vacant. All data available must cross reference to agency personnel data to enable demographic analysis to be conducted for the 6c workforce.

**Justification** - The inability of wildland fire agencies to access this level of detail of the 6c covered NWFF workforce limits the accuracy of any retirement analysis and prevents identification of vacancies within the 6c workforce. In addition, comparison of positions with 6c coverage could not be conducted within or across agency lines for this assessment.

7) **Develop an interagency policy regarding the use of Social Security Numbers (SSN) for upward reporting purposes.**

**Finding** - The data used in this assessment was obtained from multiple data sources from each agency. Aside from SSN, a unique identifier was not available to allow for accurate cross-referencing of data between the data systems and across the wildland fire agencies. The inability to synthesize data from multiple data sources limits the opportunities and accuracy of any interagency workforce analysis. Additionally, the time required to obtain permission to access the data required for this assessment that contained SSNs was both cumbersome and time intensive. Once permission was granted to obtain the information, the NWFF team found that individual bureaus had additional requirements for obtaining permission to use the data which resulted in some data containing SSNs and others not. The result of these data limitations was the inability to conduct cross agency analysis for the NWFF community.

**Recommendation** - Develop an interagency policy that removes administrative constraints associated with obtaining and using SSN for upward reporting analysis. This policy should cover the use of data from all wildland fire agencies and their individual information systems.

**Justification** - Enabling the use of SSN would drastically simplify the data consolidation process of synthesizing financial and personnel data that was required for this assessment and increase the ability to provide timely and accurate responses to data requests. The availability of this type of identifier would allow interagency assessment teams to perform detailed and comprehensive analysis of various aspects of workforce development such as career paths employees followed in the NWFF organization.

8) **Correct inconsistent coding identified in personnel data systems during the course of this study.**

**Finding** - Data provided from agency personnel systems was found to have inconsistencies with regard to the coding of some data fields. Specific inconsistencies are identified in Exhibits 6 and 7 and will not be repeated here. The presence of inconsistent data fields creates inaccuracies with regard to the conclusions drawn from any analysis conducted. Extensive data cleanup was performed during this assessment to mitigate the impact of the inconsistencies, but this type of cleanup is not feasible for daily operations.
**Recommendation** - Convene an interagency workgroup to review and document any inconsistencies in available data across the wildland fire agencies. The workgroup should revise existing data and implement a strategy for maintaining the integrity of the data in the future. This strategy may include both educating Human Resource practitioners as well as implementing system constraints with regard to the options for data input.

**Justification** - Inconsistent data between the wildland fire agencies creates opportunities for inaccurate conclusions to be drawn with regard to the NWFF workforce.

9) **Review NWFF retirement trends in five years and update workforce plans accordingly.**

**Finding** - The federal workforce falls under two retirement systems, CSRS and FERS, and each has a special benefits provision commonly referred to as 6c. As a result, the NWFF Assessment Team had four different sets of retirement rules to consider when developing future workforce trends.

Prior to 1978, employees were covered by CSRS and some of the current workforce is covered by the 6c benefit. These employees have 24+ years of 6c coverage and have the option of retiring at the age of 50 under the CSRS system but must retire or leave the covered position by the age of 57 under the 6c benefit provisions. Employees without 6c coverage under the CSRS system are eligible to retire at the age of 55 with 30 years of service and do not have a mandatory retirement age requirement. In either case, there is a financial incentive to stay beyond the minimum retirement service requirement.

If an employee entered a position in 1978 at the minimum age of 18 and was covered by CSRS, that employee would have 33 years of eligible service and would be 51 years old in 2011. With this in mind, the NWFF Assessment Team assumed that the majority of the current workforce is covered by the FERS benefit. The actual retirement rates for employees covered by CSRS is documented and using the rates in retirement projections is realistic.

The retirement rates for employees under FERS, regardless of special 6c benefit, are unknown. The core of FERS is dependent on Social Security (SS) and the Thrift Savings Plan (TSP), with a benefit to bridge any time remaining until an employee is eligible for SS. A few FERS employees covered by the 6c benefit may have already retired, age 50 with 20 years of service, but the impact of FERS retirement eligibility at any age with 25 years of service is just beginning to be seen within the NWFF workforce. As a result, trends are not yet understood or documented for employees under FERS within the NWFF workforce.

**Recommendation** - Convene an interagency task force to review projected retirement trends in five years, specifically to account for the lack of trending on FERS retirement actions.

**Justification** - While employees under either system may not immediately retire upon eligibility, it is not unreasonable to expect the FERS workforce to separate sooner than their counterparts since FERS is both portable and does not have a financial incentive for additional service compared to CSRS. The impact the retirement of employees covered by the FERS system may have on the NWFF workforce is not yet understood or documented. Therefore, the projected retirement rates in this study should be used cautiously.
Evaluate the long term organizational effects of the 6c population nearing the halfway point of their careers under the FERS retirement system compared to the historical data from employees under the CSRS retirement system.

Finding - The assessment team originally assumed that a significant percentage of the NWFF workforce would be reaching the mandatory retirement age in the near future. This assumption was not validated by the data, but the group did find that the majority of individuals approaching or entering mid-level management positions are now under the FERS retirement system rather than the CSRS system. The FERS retirement system has different voluntary retirement eligibility criteria than that of the CSRS system and to the team’s knowledge an analysis has not previously been conducted with regard to the impact the voluntary retirement criteria combined with 6c mandatory requirements will have on the future of the NWFF workforce.

Recommendation - Convene an interagency group to study the long term organizational effects of having a large percentage of the 6c population nearing the halfway point of their careers under the FERS system. The group should conduct a specific workforce analysis regarding the impact that CSRS and FERS retirement systems has on the interagency fire workforce to determine long term interagency organizational trends and retirement behaviors. The group will hand over findings to ensure that long term hiring and recruitment programs that consider these organizational trends and retirement behaviors.

Justification - Historical data regarding the retirements of 6c employees is biased towards the voluntary retirement eligibility criteria under the CSRS retirement system. The majority of the population of 6c employees currently in the NWFF workforce is covered by the FERS retirement system. These employees may become eligible for voluntary retirement prior to CSRS covered employees in the past. As a result, the employees may vacate a 6c covered position prior to mandatory retirement and if not properly planned for, the agencies may have vacancies in critical NWFF positions.

10) Benchmark other emergency response organizations for employee development and succession planning.

Finding - Agencies do not have the tools and information needed to develop and subsequently implement a successful workforce plan.

Recommendation - Form an interagency work group to benchmark other emergency response organizations for employee development and succession planning.

Justification - Data was not available in the format needed in the past to enable the cross referencing and analysis required (e.g., attrition and retirement rates) to develop a comprehensive succession plan for the NWFF workforce. Once available, the NWFF community can capitalize on best practices identified through the benchmarking process to develop and subsequently implement effective workforce development and succession plans.
11) Develop a Comprehensive Fire Workforce Succession Plan for the NWFF Organization.

**Finding -** A number of workforce development plans currently exist, but are generally lacking tools and guidance on actual implementation. The plans do not have a corporate approach (i.e., interagency fire community) and are lacking investment strategies. A comprehensive succession plan enables the communication of costs required to address mission critical needs for budgetary purposes. Additionally, both DOI and FS are working on developing succession plans individually, but not collaboratively.

**Recommendation -** Convene an interagency work group to develop and subsequently implement a comprehensive interagency workforce succession plan for the NWFF workforce at the corporate level.

**Justification -** Comprehensive succession planning needs completed at the corporate and interagency level. By not having a long term, strategic workforce succession plan the NWFF organization is reactive to change rather than proactive. Agency specific plans will not be as effective for the NWFF community as plans that are interagency in nature.

12) Review and resolve inconsistencies with regard to position qualifications and requirements between the wildland fire agencies.

**Finding -** The NWFF community does not have a consistent, widely-communicated approach to employee career development. There are at least 27 work development efforts currently going on in the wildland fire interagency community at this time, but there is no coordination overall. An important factor in employee development for wildland fire is the realization that there are usually two qualification systems that need to be followed by each individual:

1) Position Qualifications (guided by individual position descriptions, IFPM/FSFPM). Many of the positions require Incident Response Qualifications as a part of the Position Qualifications.

2) Incident Response Qualifications (guided by the National Wildfire Coordinating Group PMS 310-1 Wildland Fire Qualifications System) and Technical Specialist Qualifications (guided by agency manuals, e.g. FS 5109.17).

**Recommendation -** Convene an interagency work group to document and review inconsistencies between agencies to evaluate if business reasons exist for the differences. The group should also identify and implement opportunities to resolve the inconsistencies across all wildland fire agencies.

**Justification -** Consistent employee development allows the NWFF community to proactively develop the workforce needed to effectively accomplish their missions.

13) Develop a deliberate approach of identifying career paths available to NWFF employees.

**Finding -** Positions within the NWFF have a number of anomalies and various career paths may be taken by employees.
**Recommendation** - Form an interagency work group to develop a tool that provides employees with a clear understanding of the various NWFF career paths available and the competencies required for positions within an identified career path. One such example of this type of tool is FAMCAT (available for FS Region 8). The tool should address corporate interagency development paths.

**Justification** - The availability of a tool of this nature would empower NWFF employees to make development decisions earlier in their career.

14) **Evaluate the feasibility of conducting FIREHIRE on an interagency basis.**

**Finding** - The FS has experienced success with the use of FIREHIRE throughout different regions. DOI bureaus do not currently use FIREHIRE, but have the ability to perform “on-the-spot” hiring.

**Recommendation** - Convene an interagency task group to evaluate the feasibility of conducting FIREHIRE on an interagency basis.

**Justification** - FIREHIRE partnerships between the FS and DOI bureaus would eliminate duplicative work and resources necessary to conduct a FIREHIRE event for each separately. In addition, partnering may result in an increased applicant pool and a resulting stronger workforce.

15) **Evaluate and resolve the difficulty in obtaining and verifying recruitment data.**

**Finding** - The Assessment Team found that obtaining Avue data for historical FS recruitment efforts at the agency level was difficult. Once obtained, the data was not verifiable to ensure its accuracy. The team was unable to obtain any recruitment data for DOI bureaus.

**Recommendation** - Convene a Human Resource team to identify data needs and coordinate with system administrators to resolve the problems.

**Justification** - The inability to obtain and verify recruitment data limits the NWFF workforce from assessing the applicant pool for positions, incorporating data into workforce planning efforts, and evaluating the success of targeted outreach and recruitment strategies.

16) **Incorporate data currently housed in the IQCS system into agency learning information systems, DOI Learn and Ag Learn, and maintain connectivity in the future.**

**Finding** - The IQCS system does not currently interact with agency learning information systems.

**Recommendation** - Develop an interagency work group to develop a methodology of incorporating appropriate data currently housed in the IQCS system into agency learning information systems, DOI Learn and Ag Learn, and maintain connectivity in the future.

**Justification** - Incorporation of appropriate data would provide the NWFF workforce with visibility of all career development training they have completed in one location. DOI and
the Department of Agriculture would get credit for all training previously completed and currently documented in IQCS.

17) Expand the Provision of Temporary Support During Wildland Fire Operating Agreements (Interagency Agreement June 2010) to cover daily operation activities.

Finding - There are constraints and barriers to the interoperability of daily business within the NWFF community. The Provision of Temporary Support During Wildland Fire Operating Agreements (Interagency Agreement June 2010) only addresses the need for emergency response cooperation, but there are opportunities to gain efficiencies in day-to-day operations that could be realized if all operations were interoperable within the NWFF community.

Recommendation - Expand the Provision of Temporary Support During Wildland Fire Operating Agreements (Interagency Agreement June 2010) to cover daily operation activities.

Justification - The efficiencies gained in day-to-day operations by having operations be completely interoperable would be significant in both tangible and intangible ways. Agencies would experience seamless completion of work once administrative boundaries are removed. Additionally, redundant positions could be reduced by combining operations.

18) Identify and evaluate challenging recruitment and retention locations for the NWFF workforce.

Finding - Although the team could not locate specific data identifying locations where retaining and recruiting employees is a challenge, discussions with employees from all agencies during the course of the assessment identified this challenge.

Recommendation - Form an interagency workgroup to identify difficult and/or challenging locations to recruit and retain NWFF employees. The group should evaluate the reasons for the challenges and develop recommendations for retention tools and recruitment strategies to address the individual unit’s needs.

Justification - The NWFF community could capitalize on the experience and resources available at the corporate level to develop and implement strategies to mitigate recruitment and retention difficulties at the unit level. When woven into a corporate strategies, the whole system becomes stronger.

19) Develop a website in partnership to advertise and assist applicants for interagency NWFF positions.

Finding - Each wildland fire agency advertises and recruits independent of each other where efficiencies could be gained for the whole if the agencies partnered. DOI uses an information site that links and assists applicants for NWFF positions to all bureaus. The portal has step-by-step instructions to assist applicants from a diverse applicant pool. The FS does not have an NWFF specific website available year round to provide information regarding applying for NWFF positions.
Exhibit 9 - Recommendations

**Recommendation** - Develop a website in partnership to advertise and assist applicants for interagency NWFF and other wildland fire positions. The website could direct applicants to individual agencies for specific positions, but would initially present the wildland fire organization corporately.

**Justification** - Individuals external to the NWFF community may become confused by the interagency nature of the wildland fire organization. Collaborating to develop a marketing tool such as a website provides the wildland fire community with the opportunity to communicate consistent messages from one location.

20) **Future NWFF assessments should assess any impact that the Isabella v. Department of State ruling will have on the NWFF workforce.**

**Finding** - The Isabella ruling regarding veteran's maximum entry age (MEA) and mandatory 6c retirement may have an impact on the requirements for tracking employees covered by the 6c retirement benefit as well as workforce analysis in the future. There may be additional impacts not yet known resulting from this ruling.

**Recommendation** - Future NWFF assessments should assess any impact that the Isabella v. Department of State ruling will have on the NWFF workforce.

**Justification** - In the past the MEA ensured that employees covered by the 6c retirement benefit would meet the age and length of service requirements for the 6c benefit upon reaching the age of 57. The ruling allows the MEA to be waived for some individuals, potentially resulting in employees reaching the mandatory retirement age of 57, but not having the requisite years of service required to actually retire. The NWFF community should proactively assess the impacts this ruling will have on the workforce and operations in the future.