Training, Qualifications and Certification for Non-NWCG Entities TWT/NWCG Issue

In 1994 NWCG issued a position paper addressing training, position qualification, and certification for non-NWCG entities. With the rapid increase in contractor use, reinforced by the National Fire Plan, it is time to revisit this document. When we review this document we must look at two separate groups of non-NWCG entities; those who provide training (i.e., community colleges) and those who receive training (i.e., contract fire crews).

The following are issues that have surfaced recently from the geographic areas. They are not in any particular order.

1. Regions are getting mixed signals from national staff regarding policy on contractors. Apparently, national fire staffs are leaving policy definition up to Regions. This has created inconsistencies throughout the country in dealing with contractors.

For example, some training contractors may be benefiting more than others when local units provide agency instructors at no charge to the contractor, while the contractor collects course tuition. When member agencies decide arbitrarily to assist one entity and not another, it is probably time to look at clarifying our policy.

- 2. The use of wildfire training academies, community colleges and individual training contractors may be the wave of the future, but who is responsible for insuring instructor and course quality?
- 3. Can contract trainers, including community colleges, private wildland fire academies, etc. use the NWCG course certificate for NWCG courses? Do contract trainers require instructor certification? If so, what do we require as evidence. Who should require the evidence?
- 4. Who is responsible for "policing" the qualification and certification process for non-NWCG entities? If the government is not, then what is the big deal about safety? Is it really as important as we say it is, if we look the other way with respect to non-NWCG entities? Do we leave contractor qualifications screening up to fireline supervisors to screen arduous-level personnel for quals?
- 5. Who is responsible for providing training to private contractors (engine crews, hand crews, rx fire modules, miscellaneous overhead, etc..) including annual refresher training? The current policy leaves it up to the local unit.
- 6. Who is responsible for paying the cost of training for private contractors? Unfortunately, there is inconsistency in the way the training community views this. Some contractors get the training for free and some have to pay it.

On a side note consider this: Retired agency employees who understand the AD Pay Plan commonly receive miscellaneous training and refresher training **not only free**, but get paid an hourly wage plus per diem (if applicable) while attending it. If that isn't enough, the AD Pay Plan authorizes them to receive their highest paid wages while attending refresher training. On the other hand, private contract crews usually have to pay for the classes they attend, and do not receive wages or per diem.

There should be consistent policy for the retiree and contractor. The retiree is essentially no different from a contractor, as neither is an employee of the government, until hired under the AD Pay Plan. (This may be an IBPWT issue)

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- 7. What is our position on certification of non-NWCG courses that appear to meet our NWCG course objectives or that incorporate our course content in a slightly different package?
- 8. Who is the certifying official for contractors? The NWCG paper recommends, "member agencies not certify contractors' employees or educational institutions' trainees or instructors except where formal agreements are in place". This loophole results in inconsistent application of the policy.

The States have inconsistently assumed the role of certifier for trainees from local agencies such as structural fire departments. However, they currently shy away from sponsoring (certifying) the private contractor. Should NWCG clarify our position?

- 9. Who should issue redcards for contractors? IQCS will provide for state (and local) use of the application. What about contractors? Once again, we maintain red cards for AD's who are not employees of the government (not our responsibility) until hired, and yet we maintain their qualifications.
- 10. Do contractors *even* need proof of qualifications? Where is this mentioned? If we assume contractors need to have proof of their qualifications, and they cannot use our redcard systems, then what do they use? A blue or yellow card? A bar napkin?
- 11. If we are embracing contract fire personnel, we need to communicate the need for our incident supervisors to accommodate contractors better with respect to task book performance evaluation.
- 12. If we are going to be advocates of private sector involvement in incident management, we need to clarify our role with respect to training and certification. Otherwise, we probably should not be in the business of using contractors for incident management, especially in arduous level roles.