

# A Review of the NWCG Policy on Training, Qualifications, and Certification for Non-NWCG Entities

## NWCG Training Working Team

May, 2002

### Introduction/Background

In 1994, the NWCG issued a position paper, which addressed the training, position qualification, certification of Non-NWCG entity employees, as well as the use of Non-NWCG entities for training delivery. Since this position paper was published the use of private contractors has increased even more dramatically, and this increase has been reinforced by the National Fire Plan.

This increase in the use of private contractors for wildland fire suppression, prescribed burning, and training delivery has raised a number of questions about the application of this policy, and even its adequacy under the current national situation. This review of current policy is meant to take a second look and explore potential improvements.

### Current Policy

The current NWCG position paper on Non-NWCG entities addresses several issues. To quickly summarize the position paper,

- NWCG training, contractor employees must meet qualifications, and instructor standards, including the completion of PTB's.
- MOU's, or other formal agreements, are strongly encouraged, especially for member agencies to certify contractors' employees or educational institutions' trainees or instructors.
- NWCG course objectives will be met; course content will not be deleted.
- NWCG course certificates are used for member-sponsored training only.
- NWCG is **not** the certifying agency for contractors' employees or educational institutions' trainees and instructors (just as it is not the certifying agency for members' employees, instructors, etc.).
- Contracts and formal agreements should include language from the position paper.
- NWCG member personnel may sign off on PTB's.

### Issues

A number of issues have been raised concerning the current NWCG policy. Any review of this topic requires that these issues be understood within the context of how NWCG operates.

The National Wildfire Coordinating Group is **not** a separate agency or entity. It is a cooperative arrangement between the federal wildland agencies and the states that was designed to provide a common framework for working together on wildland and prescribed

fire. Because of this, certain functions are reserved to the member agencies/home units, such as position certification, instructor certification, etc. While the NWCG provides guidelines and common standards, each member performs these functions independently.

While the language used is often different, the issues being raised can be summarized as follows:

- Contractors are hiring, and placing on the fireline, employees who are improperly trained and unqualified.
- Unqualified instructors are training contractor employees.
- Current NWCG policy on training, qualifications, and certification for non-NWCG entities is poorly understood and applied by field units.
- Agencies seem to be inconsistent in their contracting policies and procedures, and in their adherence to the NWCG position on contractors. In fact, many of the issues raised seem to boil down to contracting problems.
- There are inconsistencies between federal agencies, and between units within federal agencies, on how private contractors are handled with respect to providing training to private contractors. Some provide such training for free, some provide it for a fee, and some do not provide it.

In addition, there are questions about how current trends may affect our ability to provide properly training and qualified firefighters in the future. Some of the issues here include:

- How do we handle non-NWCG courses being used to provide training to private contractors' employees? How do field units sort through this minefield to determine if non-NWCG courses meet contractual training requirements?

### **Recommendations**

1. Agency Fire Directors should work with their agency contracting officers to ensure applicable "general" stipulations from the position paper on training, qualifications, and certification of non-NWCG entities is placed in all contracts for outside firefighters.
2. NWCG and Agency Fire Directors should work to clarify NWCG's position on training, qualifications, and certification of non-NWCG entities. Such clarification should address the following issues and should be addressed to GACG's and member agencies.
  - What is a "recognized contractor association?" How do contractor associations become "recognized?"
  - Who is the certifying agent for contractors who are not part of a contractor association, or who are members of an association that does not have an oversight committee? Should such contractors even be used on fires?
  - Should contractor associations be required to have oversight committees?
  - What is the process for obtaining clarification on procedural questions related to this policy?

3. Federal Fire Directors should develop guidelines for how and when federal units will provide training to private contractors.
4. NWCG should develop a statement encouraging NWCG member agency's personnel to sign off on individual tasks of contractors and educational institution's trainees. This statement should go to all GACG's and member agencies.
5. Federal agencies should incorporate information on managing training, qualifications, and certification for non-NWCG entities into training provided to line officers.