

National Incident Commander/Area Commander Council

April 28, 2021

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

From: Mike Minton, Chair - National Incident Commander/Area Commander Advisory Council (ICAC)

Subject: Response to IWDG Memo 20-01

The National Incident Commander/Area Commander Council (NICACC) received a tasking from the Incident Workforce Development Group (IWDG) in February of 2020 through IWDG Memo 20-01. Response to the memo was delayed by the pandemic and 2020 fire year however, ICAC convened a task group in March of 2021 to address this request. This document is a response to the request from IWDG to provide recommendations to the six bulleted asks from that memo.

Bullet #1

- Define the core members of an IMT roster to focus on Command and General Staff (C&G) and key Unit Leader positions with a goal of limiting rosters to critical positions necessary for efficient team function and interaction (potentially between 20 and 30 positions). Utilize a pool concept to access additional individuals with skill sets needed for specific incidents. And identify when name requests are an appropriate avenue for filling orders.

Response to #1 *See attachment #1 (excel doc. CIMT)*

The Concept of a “pool” is not preferred by this group but rather application of the normal IROC ordering system with provision for use of the name request process to fill “expanded roster” needs.

Bullet #2

- Develop successional strategies that address IMT trainee needs and identify the necessary coordination and interaction with coordinating groups to enable ICs to succeed in managing IMTs.
- Consider the application of an IMT coordinator at NICC and/or in the GACCs to facilitate expanded roster needs and IMT mobilization in an efficient manner.

Response to #2

The group recognizes many aspects to successional strategies in maintaining incident management teams. Below are some core concepts and recommendations to this topic:

- Geographic Area Training Representatives (GATRS) should be encouraged to work closely with Complex Incident Management Teams (CIMTs) in assigning trainees for each position activated upon mobilization. Geographic Area priority lists for Command and General staff positions should be

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developed jointly by the GATRs, Incident Commanders and Geographic Area Coordinating Groups (GACGs) to ensure efficiencies are maximized in experiential training.

- The Incident Commander trainees in a Geographic Area should be selected and prioritized by the GACG and the priority order applied by the GATRs for mobilization.
- Consider the development of an IT deployment specialist or a contract service to ensure sound connectivity and virtual communication effectiveness on incidents.
- The 10 trainee positions identified on a roster for trainees would be filled by Command and General Staff trainees. These may be selected by the ICs or assigned by the GACG.
- Employing agencies that participate in providing personnel for incident management should consider incentives for those who are selected on an IMT roster or participate as expanded roster responders annually.
- Federal agencies should consider IFPM qualification requirement bridges to Unit leader and Command and General Staff positions on IMTs.

Bullet #3

- Compose teams that are scalable in size and complexity to deal with a broader range of incident types.

Response to #3 *See attachment #1 (excel doc. CIMT)*

The CIMT framework on attachment #1 applies the concept of a CIMT comprised of 25 qualified individuals and 10 trainees. The expanded support list identifies additional positions that may need to be ordered depending on the circumstances of the incident. Field support positions are those which traditionally are ordered for incident specific needs based on the scale and span of control needs on an incident. This model applies an approach to scalability which assumes a foundational need of 25 qualified individuals rather than the current number of 44.

An ICS assessment tool should be developed to complement the Organizational Needs Analysis (ONA) in WFDSS. This tool would translate certain characteristics of an incident to how many positions from expanded support are essential to properly staff the incident.

The group further recommends that “short” teams (Command and General Staff positions only) be reserved for non-wildfire emergency response or training purposes. This should be a rare event and only applied in circumstances where the short team is working as a subordinate organization to a larger effort or providing training for other ICS organizations.

Bullet #4

- Begin evolving toward a three-tier Incident Management Team structure (Initial Attack, Extended Attack/Emerging Incidents, Complex Incident Management)

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Response to #4

The group supports the proposal to move to three tier structure of Initial Attack / Extended Attack / Complex Incident Management. The following items are recommendations to consider with implementation of this change:

- Revise the ONA in WFDSS.
- Revise / replace the complexity analysis in the red book with an ICS assessment tool.
- Develop the parameters/characteristics for “Extended Attack” vs. “Complex” commensurate with the capabilities and qualifications of responders.
- Revise training and workforce development pathways to qualification for working in the three tier structure, such as; collapsing the current S-420 and S-520 into a single complex incident management course, developing extended attack incident organization training as a way to further enhance our current “type 3” organizations and teams.
- Maintain the existing Area Command Teams, focus future training (S-620 or equivalent) on strategic management of multiple complex incidents in a sub-geographic area or functioning in a MAC support role during high levels of preparedness.
- Encourage Geographic Areas to formally organize “extended attack teams” applying the type 3 model and manage them in a sub-geographic or state manner to maintain rapid response and local knowledge.
- Encourage the use of CIMTs to provide mentorship and coaching to extended attack organizations and teams.

Bullet #5

- Provide input on length of availability periods and duration of commitments to enable the Geographic Area Coordinating Groups to better manage IMT rotations and assignments.

Response to #5

The group agrees that managing fatigue of IMTs should be a partnership between NMAC, the Geographic Area and the Incident Commanders. We believe simply moving to single type complex IMTs will be a benefit to fatigue/assignment management. Below are our recommendations in how to potentially further address this:

- Mobilization of a CIMT should not exceed 21 days, inclusive of travel in National PLs of 1-4.
- Provisions to allow for a commitment of more than 21 days should be developed and authorized by NMAC under National PL 5. This model would include rotating personnel within the CIMT for a minimum of 48 consecutive hours off duty in a maximum 30 day period (inclusive of travel) and 7

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days of unavailability on the CIMT post assignment. A decision to authorize this would need to be approved by NMAC no later than day 19 of an incident.

- CIMTs should not be “reassigned” to a new incident order after 14 consecutive days on assignment.
- CIMTs should be expected to manage a “period of availability” of not more than 10 consecutive months per year. GACGs should consider managing a staggered schedule of their established teams to ensure year-round coverage.

Bullet #6

- Actively engage with Geographic Area Coordinating Groups to manage work/rest and life balance issues for IMTs during extended periods of high activity (PL4 and PL5).

Response to #6

The concepts described in bullet #5 largely apply to this item.

The group suggests that GAs manage within region rotations of CIMTs in national Preparedness Levels (PL) 1,2 and 3. Upon reaching National PL 4 and 5, all CIMT orders should go to NICC and NMAC should manage these assignments.

Using a national ICAP system for CIMT application and selection is suggested. The system should be capable of accepting applications and generating applicant lists commensurate with each Geographic Areas needs on an all year basis. It should also have provisions for reviewing and approving out of GACC applicants.

Additional considerations discussed by the group

In the process of this dialogue, the ICAC task group also discussed potential consequences and benefits of the model change to Complex Incident Management. The group felt it was important to share this perspective with IWDG:

Potential consequences of change

- Potential short term loss of people currently participating on teams
- Disruption of team cohesion
- Concern on mobilization efficiency and potentially an increased lag time to fully staff an incident
- Potential loss of commitment in the team environment
- Increased commitment from host unit staff to participate in the incident staffing needs
- Fear of individual financial loss

Potential benefits of change

- Smaller core teams can build stronger trust relationships and strong cohesion
- IC would have latitude to build the core team

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- Opportunities to build new efficiencies leveraging virtual workforces and changing expectations of how teams operate
- Flexibility/scalability will be increased
- CIMT concept will bring in new ideas by a new way of organizing with fresh ideas
- New opportunity for many personnel being tied to a team and not being used. Increase of personal independence.
- Opportunity to fix the main problem of not having sufficient personnel to staff the current compliment of IMT's
- Exciting opportunity to be a part of creating the future of Incident Management

Conclusion

The task group for this effort consisted of eight type 1 ICs from 5 different geographic areas, one type 2 IC, two Area Commanders and 1 NIMO IC. The group recognizes that a variety of perspectives and opinions exist around the topic of change to our legacy interagency IMT system. We have concluded that ICS is intended to be scale able and as such should always be capable of sustaining change in how we apply it. While our existing application has proven to be effective in the past, we concur that in our current circumstances of wildfire conditions and workforce availability it is unsustainable into the future. It is our recommendation that participating agency leaders consider measures to enhance the workforce and incentivize IMT contributions to strengthen this response capability into the future.

If there are questions regarding this response or a need to further contribute to the IWDG efforts, please contact my self or our Vice Chair, Zeph Cunningham.

Mike Minton
Chair, NICACC

Complex Incident Management Team

25 plus 10 trainees rostered

Incident Commander

Deputy Incident Commander

Liasion Officer

Safety Officer

Information Officer

Operations Section Chief

Operations Section Chief

Air Operations Branch Dir.

Planning Section Chief

Logistics Section Chief

Finance Section Chief

Operations Branch Dir.

OPBD or DIVS

Air Support Group Sup.

ITSS or CTSP

Situation Unit Leader

Resource Unit Leader

GISS***

Communications Unit Leader

Medical Unit Leader

Supply Unit Leader

Facilities Unit Leader

Ground Support Unit Leader

ORDM or PROC***

Time Unit Leader

Trainee TBD

Trainee TBD

Trainee TBD

Trainee TBD

Trainee TBD

Trainee TBD

Trainee TBD

Trainee TBD

Trainee TBD

Trainee TBD

Expanded Support List - IROC

up to 25 additional personnel (scaleable)

may name request

Safety Officer

Information Officer ***

Air Tactical Group Supervisor

Air Support Group Supervisor

Deputy Plans Section Chief

Deputy Logistics Section Chief

Deputy Finance Section Chief ***

Operations Branch Director

Division Group Supervisor

Situation Unit Leader ***

RSUL / DOCL / GIST

FBAN / SOPL / LTAN ***

ICMM / COMT / RADO

Base Camp Manager

Cost Unit Leader ***

PTRC / EQTR

Add Trainees assigned from GA

Field Support List - IROC

numbers will vary

Line Safety

PIOF

HEBM

THSP

Ground and Facility Support

DIVS and STAM

STL and TFLD

FOBS

1. positions in yellow are recommendations, GACGs may have discretion on these

2. the listed trainee spots are assigned to positions in green

3. Incident Commander trainees would be managed / prioritized / assigned by GA and NMAC

4. positions with *** denotes; may work virtually

5. positions on the expanded support list would be ordered in IROC by the ordering GACC as necessary

6. positions on the field support list would be ordered in IROC by the ordering GACC as necessary