

## **STANDARDS FOR OPERATIONS AND SAFETY**

### **1 Introduction**

Primary guidance for operations and safety is contained in the current edition of the [Interagency Standards for Fire and Fire Aviation Operations](#). This chapter of *Reference Manual 18* addresses operations and safety topics not included in that guide.

The foremost guiding principle of [Federal Wildland Fire Management Policy, January 2001](#) is that firefighter and public safety is the first priority in every fire management activity. All fire management plans and activities must reflect this commitment.

Commitment to and accountability for safety is a joint responsibility of all firefighters, managers, and administrators. Individuals must be responsible for their own performance and accountability. The safety of employees and visitors must be of primary concern during fires. Agency administrators at all levels need to stress that firefighter and public safety always take precedence over property and resource loss.

All firefighters have the right to a safe assignment. All employees have the right to turn down unsafe assignments; they also have the responsibility to identify alternative methods of accomplishing the mission. For more information on proper protocols, refer to the [Incident Response Pocket Guide](#) (IRPG) (NFES 1077, PMS 461) under “How to Properly Refuse Risk.” All personnel are authorized and obligated to exercise emergency authority to stop and prevent unsafe acts.

### **2 Responsibilities**

To assist agency administrators and fire program managers to meet their respective fire program and safety responsibilities, the chapter on NPS Program Organization and Responsibilities in the [Interagency Standards for Fire and Fire Aviation Operations](#) specifically outlines management performance requirements for fire operations and safety. Agency administrators and fire program managers will be held accountable for meeting these requirements in preparedness and program reviews. Preparedness reviews are completed annually and it is expected that areas in need of improvement will be addressed and mitigated to the extent possible between reviews.

Park superintendents who have potential wildland fire response in their park, their designated acting superintendents, and supervisors of fire management officers (FMOs) must attain and maintain the Agency Administrator (AADM) qualification in the Incident Qualifications and Certification System (IQCS). The qualification must be attained within two years of appointment to the positions listed above. Specific implementation plans for this requirement can be found in the National Park Service Program Organization and Responsibilities chapter of the [Interagency Standards for Fire and Fire Aviation Operations](#).

### **3 Field Operations**

#### **3.1 Personnel Evaluations**

Attention to safety factors is critical to the evaluation process. These evaluations must be honest appraisals of performance. The documentation of substandard or unsafe performance involved with an individual, incident management team, fire resource, or equipment is mandatory. Unsafe or substandard safety acts or conditions should be reported using [SAFENET](#). Documentation should be shared with the Regional Fire Management Office.

#### **3.2 Investigations**

All wildland fire serious accidents and wildland fire accidents not meeting the serious accident criteria must be investigated. These include accidents involving the following:

- Entrapments
- Fire shelter deployments
- Fatalities
- Injuries leading to inpatient hospitalization of three or more personnel
- Property or equipment damage of \$250,000 or more

Definitions of these categories, options for types of reviews or investigations and descriptions of processes are included in the Reviews and Investigations chapter of the [Interagency Standards for Fire and Fire Aviation Operations](#).

Additional information on reporting, conducting, and documenting investigations is included in exhibits 1 and 2, *Director's Order 50B*, and [Reference Manual 50B, Occupational Safety and Health](#).

The Division Chief, Fire and Aviation Management has limited delegation of authority from the Designated Agency Safety and Health Official (DASHO) to convene Serious Accident Investigation Teams for wildland fire incidents meeting

serious accident investigation criteria as defined in Reference Manual 50B, Occupational Safety and Health.

[A Memorandum of Agreement between the United States Department of Agriculture Forest Service and the Department of the Interior](#) signed in 2015, builds upon the 1995 USDA/DOI Memorandum of Understanding and states that interagency serious accident investigations will be conducted cooperatively between the USDA Forest Service and DOI. An attachment to the MOA, *Selection Table for DOI/USFS/ Serious Accident Investigation Type*, further outlines the criteria to be used to determine which serious accident investigation process will be used on interagency investigations.

### **3.3 Safety Management Information System (SMIS)**

[Safety Management Information Systems](#) (SMIS) is an automated system for reporting accidents involving DOI employees, volunteers, contractors, or visitors to DOI facilities. The application can only be used by authorized DOI employees, supervisors, and safety managers. All NPS accidents must be entered into SMIS by the supervisor as soon as possible and never later than six days after the accident or incident. For additional NPS guidance on SMIS, please refer to [Director's Order 50B](#) and [Reference Manual 50B, Occupational Safety and Health](#). The number issued by SMIS when the claim is established is the SMIS ID number and is only used to access the claim in the SMIS program. The OWCP claim number is issued by the Department of Labor (DOL) and is the one used to obtain medical treatment and facilitate the payment of bills.

In order to obtain a claim number from DOL a CA-1 or CA-2 must be filed. The National Park Service's mechanism for filing the claim is the SMIS program. The information is input into SMIS and submitted to DOL via daily electronic transmissions. Once the claim is received and the claim number established by DOL the information is sent back to SMIS and the employee and workers' compensation coordinator receive emails from the SMIS auto mailer with the claim number in it. This can take up to 48 hours depending on when the claim is input and where that falls in the daily transmission schedule. The workers' compensation coordinator can sometimes see the claim number at DOL earlier than the email is received from SMIS.

### **3.4 Medical Standards**

[DOI Office of Wildland Fire \(OWF\) Policy Memorandum 2016-014](#) requires all arduous level wildland firefighters to complete a medical standards physical exam. These exams are coordinated through a contracted medical services provider) and results are managed in a database that tracks all medical personnel files. Any permanent, seasonal, temp, student, collateral duty or

Administratively Determined (AD) employee of the park who will be operating in a position or qualification requiring arduous fitness will show a current “Qualified” baseline or periodic medical exam, or self-certification, prior to participating in the work capacity test (WCT). Fitness levels for National Wildfire Coordinating Group (NWCG) qualifications can be found in the [NWCG PMS 310-1, National Incident Management System: Wildland Fire Qualification System Guide \(PMS 310-1\)](#). Baseline medical exams will be offered the first year and a periodic exam will be done every third year. Self-certification will be done through the medical provider’s database during the years between exams. Exams and self-certifications with a “Qualified” determination are valid for one year. Medical exams are a condition of hire for all new employees whose position description requires arduous fitness and are to be ordered by the hiring official after the drug test is completed. Medical exams are a condition of performing arduous duty for militia or collateral duty wildland firefighters. All exams, risk mitigations and medical standard waivers completed by other DOI bureaus will be accepted by the NPS.

Risk mitigations or medical standard waivers will be completed for any individual that received a “Not Qualified” status should the individual choose to engage in this process. Individuals in a primary position or in a position where arduous duty is required via IFPM standards must engage in the risk mitigation or medical standard waiver process. If they choose not to engage in the process then Human Resources will need to determine next steps, however the individual will not be permitted to function in arduous roles until a risk mitigation or medical standard waiver is accepted. Risk mitigations and waivers must be reviewed by the National Office Medical Standards Coordinator prior to being submitting to the Park Superintendent, or delegated acting, for a decision and documentation by signature. Further direction on this process and direction on Law Enforcement medical exam requirements for participation in wildland fire can be found at: [https://www.nifc.gov/medical\\_standards/](https://www.nifc.gov/medical_standards/)

If an individual receives a “Not Qualified” determination they are no longer permitted to function in any arduous capacity roles until they are cleared. Positions that are arduous, as identified by the NWCG PMS 310-1, must be suspended in the Incident Qualification and Certification System (IQCS) and removed from exporting to the Resource Ordering and Status System (ROSS) until the individual is cleared for duty.

Individuals participating in a light or moderate Work Capacity Test must complete a Health Screen Questionnaire (HSQ) prior to taking the WCT. Further direction for that process can be found in the [Interagency Standards for Fire and Fire Aviation Operations](#) and at the [DOI Medical Standards webpage](#).