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BUREAU OF INDIAN AFFAIRS
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Memorandum

To: Regional Directors, All Regions
Attention: Forestry/Fire management

From: Chief, Branch of Fire Management

James L. Shree

Subject: Clarification on Training Policy for Administratively Determined (AD)
Emergency Hires

The purpose of this memorandum is to clarify policy related to the use of the AD hiring authority for training.

Training Courses Authorized for AD hires

Only courses referred to as "Required" in the 310-1 (PMS 310-1, Wildland and Prescribed Fire Qualification Guide) are authorized for delivery to AD hires. The only exception to this rule is Annual Safety Refresher Training, which is currently an annual training requirement for AD employees who work on the fire line, as well as any reference in the Wildland Fire and Aviation Program Management and Operations Guide to training requirements exceeding 310-1 standards.

For example, an AD employee who is currently qualified as a FFT2 (Firefighter) and is pursuing a qualification as FFT1 (Advanced Firefighter/Squad Boss) is only authorized to attend Advanced Firefighter Training, S-131 as it is the only training course required for the position of FFT1. The AD employee in this example would not be authorized to attend discretionary courses such as Supervisory Concepts and Techniques (S-281), Portable Pumps and Water Use (S-211), and Wildfire Power Saws (S-212).

The 310-1 clearly identifies which courses are "required" prior to position qualification. Courses described in the 310-1 as "Additional Training Which Supports Development of Knowledge and Skills" are not required, and consequently not authorized for delivery to AD hires. The knowledge and skills derived from these non-required courses are assumed to be acquired by the time the employee completes a Position Task Book. In other words, they are obtained naturally through the process of deriving actual experience in the line of

duty while completing the Position Task Book for a given position.

Annual Limitations on Training Hours for AD Trainees

The 2004 AD Pay Plan states that AD Hires "will not exceed a total of 80 hours per calendar year for an individual in preparation for emergency fire situations". It is important to reiterate the last few words in this sentence, "in preparation for emergency fire situations", as any training taken must be limited to only essential training that is required in order to be qualified for critical fire suppression positions. It is important to note that the 80 hours identified as a maximum within the AD Pay Plan not be construed as an annual entitlement.

To further illustrate why the 80 hour maximum is not an annual entitlement, consider the following example. An AD employee is qualified as a FFT1 Trainee. This assumes they are FFT2-qualified, have completed S-131, and have an initiated position task book for FFT1. In this case, the AD employee would only be authorized to take Annual Safety Refresher Training. This is an 8 hour class. This leaves 72 hours before the maximum is obtained. However, because no other training is required, no other training can be taken, regardless of whether there is 72 hours left or not. Since the employee is still a FFT1 Trainee, they are not authorized to take S-230 or S-290, the next two courses required for CRWB.

The 80 hour maximum for AD training is comprised of not only class contact hours but also any hours associated with travel to and from the training location. In any case, the combination of the two cannot exceed 80 hours per person.

The AD Pay Plan authorizes training up to "120 hours per calendar year for an individual in preparation for fire emergencies when state or federal licensing and/or certification requirements exist (for example, pilots, Emergency Medical Technicians [EMT's])." The use of this provision is considered rare and will not be used to justify training associated with technical specialist positions.

AD Instructor Rules and Qualifications

The AD Pay Plan also authorizes the hiring of instructors for emergency situations. Specifically, it authorizes the hiring of "personnel to instruct fire suppression training when all other methods of hiring and contracting instructors have been exhausted, not to exceed a total of 120 hours per year for a qualified individual to prepare, instruct, and issue certificates for required courses for emergency fire situations...".

BIA and tribal fire programs will make every attempt to utilize instructors who are employees from within their own organizations first, before considering instructor contracts.

As a last resort, AD instructors may be hired but only on those rare occasions when national fireline resources become so depleted that it becomes necessary to train more rookies on an emergency basis. This would coincide with a National Preparedness Level

5 (PL5).

If it becomes necessary to hire AD Instructors to deploy emergency training, the following rules will apply relative to instructor qualifications:

Lead instructors must have sufficient experience in presenting all units of the course. (Exceptions may occur where courses are of such a technical nature that no one person may be technically competent to instruct all units, e.g. S-493). Lead instructors must be position qualified at the next higher job level (e.g., a Lead Instructor for S-230 Single Resource Boss-Crew, must minimally be qualified as a Strike Team Leader-Crew).

Unit instructors must be experienced in the lesson content they are presenting. They must be position qualified at the job level to which the training course is targeted (e.g., a Unit Instructor for S-230 Crew Boss, must be qualified as a Crew Boss).

The Field Manager's Course Guide is the Authoritative reference on class length and instructor qualifications and can be obtained at www.nwccg.gov.

In closing, the AD hiring authority was historically approved as a mechanism for employing firefighters on an emergency basis, when all federal sources are exhausted. Over the years, the intent of this policy has changed little. As we enter another fire season, we should review this hiring authority again, to insure accurate and consistent use.

If you have any questions regarding this hiring authority and training policy, please contact Dave Koch at 208-387-5577.