



# United States Department of the Interior

BUREAU OF INDIAN AFFAIRS  
Washington, DC 20240

**AUG 16 2018**

IN REPLY REFER TO:

## Memorandum

To: All Regional Directors  
Attention: Agency Superintendents  
Regional Fire Management Officers

From: Acting Director, Bureau of Indian Affairs

Subject: Guidance for BIA Fire Contracted Equipment/Land Use Payment Process

This memorandum authorizes and provides Bureau of Indian Affairs (BIA) the attached guidance for BIA Fire Contracted Equipment/Land Use Payment Process (1-BPA, EERA, Emergency Facilities/Land Use Agreement).

To ensure the bureau has strong fiscal accountability in wildland fire programs, the host incident agency must ensure they are working toward timely payments. This guidance provides comprehensive instructions for completing payment packages to avoid delays with paying incident contractors.

This guidance is effective immediately and will remain in effect until rescinded or modified. For additional information, please contact Robin White, Administrative Officer at (208) 387-5463, or email [robin.white@bia.gov](mailto:robin.white@bia.gov).

Attachment - Guidance BIA Fire Contracted Equipment/ Land Use Payment Process

**BIA Fire Contracted Equipment/Land Use Payment Process**  
**{1-BPA, EERA, Emergency Facilities/Land Use Agreement}**

Payments for contracted resources are the responsibility of the host incident unit. Pre-season agreements awarded for use within identified geographic areas may be solicited and awarded by multiple Federal or State partners, but payment responsibility for resources utilized under those awards lies with the host incident unit. For example: BIA may utilize a USFS awarded VIPR agreement, but BIA as the host agency is responsible for payment, not USFS as the awarding agency.

In order to process payments for contracted resources it is necessary to provide a complete invoice package that has been fully audited and approved for payment to avoid delays in paying the contractor. The host incident unit is responsible for completion of the invoice package either directly or by delegating to an IMT Finance Section. BIA payments will be emailed to the BIA Reston payment team at [ia\\_cfo\\_firepayments@bia.gov](mailto:ia_cfo_firepayments@bia.gov) after the appropriate BIA Approving Official has audited and approved the invoices. Invoices should not be sent to the payment team directly from the incident.

A complete payment package should include the following documentation:

1. **Emergency Equipment Use Invoice (OF-286)** is completed by the host unit for the incident. Host unit can prepare directly or an IMT Finance Section, if delegated by the host unit, can prepare. *Refer to the Interagency Incident Business Management Handbook (IIBMH) March 2016, page 20-52 (Exhibit 29) for an example of a completed OF-286.*
  - a. Ensure the contractor's Unique Entity Identifier (DUNS number) is included in Box 1b. This information can be found in the agreement.
    - i. A Unique Entity Identifier is a payment requirement for all Federal contractors.
    - ii. Each contractor must also be registered and active in the System for Award Management (SAM) located at SAM.gov
  - b. Box 9 should reflect the address for the BIA Payment Office regardless of the Agency that awarded:

BIA Reston Fiscal Services  
ATIN: EERA Payments  
12220 Sunrise Valley Drive  
Reston, VA 20191
  - c. Ensure the OF-286 is signed by the Contractor's Representative and by the Receiving Officer {does not need to be a BIA signature} prior to release from the incident. The Contractor's Representative should be provided with a copy of the full invoice package.
2. **Copy of the appropriate agreement for the contracted equipment/land signed by a federally warranted contracting officer/specialist.** *Some awards are solicited and awarded by State partners; these awards are valid for Federal use if the award is counter-signed by a federally warranted CO.*
  - a. SF-1449 for **pre-season** competitive Incident Blanket Purchase Agreements {1-BPA} or Virtual Incident Procurement (VIPR) awards. *Refer to 2016 1/BMH page 20-58 (Exhibit 32) for an example of an SF-1449, **QR***
  - b. OF-294 for **incident-only** non-competitive Emergency Equipment Rental Agreements (EERA). *Refer to 2016 1/BMH page 20-37 (Exhibit 26) for an example, **QR***
  - c. Emergency Facilities & Land Use Agreements {March 2015}. *Refer to 2016 1/BMH page 20-62 (Exhibit 35) for an example.*
3. **OF-296 Vehicle/Heavy Equipment Pre-Use Inspection Form (Rev. 6-2015).** *Refer to 1/BMH page 20-45 {Exhibit 27} for a copy of the form.*

- a. New OF-296 (revised 6-2015) forms must be used beginning on October 1, 2016, per NWCG Memorandum No. 16-003 (Amended) released on March 18, 2016.
  - b. OF-296 should be signed by the Equipment Inspector in Box 10 and by the Contractor/Equipment Operator in Section III during the pre-use inspection.
  - c. Box 11 should be completed upon release and signed by the Contractor/Equipment Operator and include the name of the Equipment Inspector.
    - i. The new OF-296 no longer has specific pre-use and release columns for inspection. It is encouraged that the equipment be inspected at release and any damage noted in Section V - Remarks.
    - ii. "No Damage/No Claim" should be checked in Box 11 and reviewed with the Contractor/Equipment Operator prior to signature.
4. **OF-297 Emergency Equipment Shift Tickets.** Refer to 20161/BMH page 20-49 (Exhibit 28) for an example of a completed shift ticket.
- a. OF-297 should be completed by the Contractor/Equipment Operator and signed by the appropriate Incident Supervisor. Pink and blue copies should be submitted to the host unit OR IMT Finance Section, whichever is handling finance for the incident.
  - b. OF-297 should be completed to match the payment requirements on the contractor's agreement. If mileage is included in the agreement, the beginning and ending mileage should be noted in Box 14 Remarks.
5. **Resource Order.** Refer to 20161/BMH page 20-35 (Exhibit 24b) for an example.
- a. A resource order that reflects the contractor name, request number, order date/time, and released date/time is necessary for payment.
    - i. Resource orders issued through the Resource Ordering Status System (ROSS) are preferred, but handwritten resource orders on an ICS 259-9 form (Refer to 2016 1/BMH page 20-34 (Exhibit 24a) are acceptable.
6. **Additional documentation supporting additions/deductions to the invoice.** Examples include, but are not limited to:
- a. **OF-304 Emergency Equipment Fuel and Oil Issue.** Refer to 2016 IIBMH page 20-55 {Exhibit 30} for an example. Refer to terms and conditions of agreement, most pre-season awards require the contractor to accept charge card payment to reduce the need for fuel issue tickets.
  - b. **Mechanic invoice.** If repairs to equipment were provided and paid for by the Government, the Contractor invoice should reflect a deduction.
  - c. **Lodging/Subsistence receipts.** Remain Overnight (RON) allowances may be added to the invoice if the RON requirements detailed in the agreement terms and conditions are met.

Invoice packages should never be sent directly to the payment center from the incident.

- 1. The host unit or the IMT Finance Section, if provided the information, should forward all completed invoice packages to the designated Regional Office Approving Official for audit and approval. Refer to Attachment 1 for a list of BIA Regional Offices.
  - a. Incident payment packages are considered emergency payments and are not subject to the Prompt Payment Act 30-day requirement and should be processed as quickly as possible once the contractor is released from the incident.
  - b. In person hand off or overnight FedEx/UPS delivery is recommended to ensure prompt delivery to the designated Approving Official and is an allowable suppression expense.
- 2. Each Regional Office is responsible for designating an Approving Official(s) who is familiar with incident invoice packages.

- a. Any requests to change designated Approving Officials should be routed through the BIA Administrative Officer with the Branch of Wildland Fire Management (BWFM) at the National Interagency Fire Center (NIFC).
3. Reston Fiscal Services will maintain a list of designated Approving Officials for incident payments.
  - b. Any invoice package received without the signature of a designated Approving Official will be returned to the sender.
4. Approving Officials should complete a 100% audit of all incident invoice packages to ensure that all information is accurate and in compliance with the appropriate agreement.
  - a. While 100% audit is required it is also necessary to process emergency payments quickly to get contractors paid for their services. Overtime (110/113 T&A code) charges are allowable suppression charges for Approving Official personnel to ensure prompt payment. *A resource order for a THSP {Finance} should be issued to support overtime charges.*
  - b. In the event of a large incident with numerous contracted resources it may be necessary to enlist the assistance of an Administrative Payment Team (APT) to assist with getting invoice packages processed in a timely manner. *Resource orders should be issued for identified payment team members.*
    - i. It is encouraged that regions reach out to other regions for assistance with contractor equipment invoices if help is needed to ensure timely processing of invoices.
5. Approving Officials should write the FBMS Vendor Code associated with the Contractor's unique entity identifier (DUNS) in Box 1 of the OF-286 invoice.
6. Approving Officials should assign a document control number to each OF-286 invoice to assist with tracking the payment in FBMS.
  - a. The Reston payment team member that processes the payment in FBMS will include the assigned document control number as a Reference Number for tracking purposes.
7. Approving Official should ensure that a complete and accurate accounting string is included on the OF-286.
  - a. A label with the cost code added to Box 22 of the OF-286 is a quick and easy way to add the appropriate accounting string.
8. Approving Official should sign the OF-286 in an area where signature can be easily seen by the payment team.
9. Approving Official should scan and email approved invoice package to BIA Reston Fiscal Services at [ja\\_cfo\\_firepayments@bia.gov](mailto:ja_cfo_firepayments@bia.gov).
  - a. Incident payment packages are considered emergency payments and are not subject to the Prompt Payment Act 30-day requirement and should be processed as quickly as possible once the contractor is released from the incident.
10. BIA Reston Fiscal Services will process payment upon receipt of the invoice package with the appropriate Approving Officials' signature.
11. Approving Official will track payment in FBMS as necessary.

**What should the Approving Official audit include?**

1. Review box 18a of the applicable SF-1449 award to confirm which agency is responsible for payment.
  - a. Pre-season competitive agreements will not list a specific payment office which indicates that the *host incident agency* is responsible for payment regardless of which Federal/State Agency awarded the pre-season 1-BPA.
  - b. Incident only EERA's that are signed during the incident are always the responsibility of the *host incident agency*.
  - c. National Contracts (Airtanker services, T1/T2 helicopters, transport aircraft, portable retardant base, bulk retardant, T2 IA National Crews, national caterers, and mobile showers) are always paid by the US Forest Service (USFS) Albuquerque Service Center (ASC) and box 18a will reflect USFS ASC as the payment office.
2. Contractor name and address in Box 1 of the OF-286 matches the contractor name and address on the applicable agreement document and registration information from SAM.gov.
3. Box 1b of the OF-286 includes the contractor unique entity identifier (DUNS) and the identifier number corresponds with the correct vendor in FBMS.
  - a. Write the FBMS vendor code in Box 1 of the OF-286.

- i. **Core Financials> General Ledger > Display Vendor Balance**
- ii. Select the search icon next to "Vendor Account" field.

- iii. Ensure you are using the "US Department of The Interior" tab, enter the vendor DUNS number and select the green check.

- iv. The vendor information will display with the FBMS Vendor Code (vendor code will start with a7)

DUNS No.	SearchTerm	PostalCode	City	Name 1	Name 2	Vendor
805693699		59601-6401	HELENA	ENTERPRISE RAC COMPANY OF MONTANA/WYOMING, LLC		71324777

4. Box 2 of the OF-286 includes the incident name and incident number.
5. Box 3 of the OF-286 lists the appropriate agreement number from the applicable SF-1447, OF- 294, or Emergency Facilities/Land Use Agreement.
6. Box 4 of the OF-286 lists the agreement beginning and ending dates identified on the applicable SF-1447, OF-294, or Emergency Facilities/Land Use Agreement. If the date of the incident is outside the dates of the agreement it is not valid and a new agreement or a modification extending the date needs to be provided by the Contractor.
7. Box 5 of the OF-286 clearly identifies the equipment hired for the incident. This should be as specific as possible to match the information in the applicable agreement. Include the Make, Model, Serial or VIN number, and License Plate if possible. *Some agreements have multiple pieces of similar equipment included, make sure the appropriate equipment is listed and paid by matching the VIN number listed on the inspection with the VIN number listed on the agreement.*
8. Box 6 of the OF-286 should match the point of hire identified on the appropriate agreement.

9. Box 7 of the OF-286 should match the date on the initial shift ticket.
10. Box 8 of the OF-286 should match the time on the initial shift ticket; remember travel to the incident is considered to be time under hire.
11. Box 10 of the OF-286 should usually be marked as Contractor if the contractor is providing supplies necessary to operate. Pre-season agreements will typically require the Contractor to provide all supplies under their agreement, incident-only EERA's will occasionally have the Government provide the necessary supplies but only if it is deemed in the best interest of the Government.
12. Box 11 of the OF-286 should usually be marked as Contractor if the contractor is providing the operator necessary to operate the equipment. If the Government is providing the operator (ie: rental cars) the Government box should be checked.
13. Box 12 of the OF-286 should match the request number on the corresponding resource order.
14. Box 13 of the OF-286 should identify the appropriate year and each row should include the numeric month and calendar day that the contractor worked. There should be an emergency shift ticket for each day included on the OF-286.
15. Box 14 of the OF-286 pertains to the rate information obtained from the appropriate agreement. Most pre-season agreements include a daily rate as the standard rate and some agreements include mileage as a special rate. Make sure that the unit is properly identified (hour, day, mile, etc.) and that the rate in 14b corresponds with the rate in the applicable agreement. Some agreements include multiple rates for multiple pieces of equipment, check the VIN number listed in the agreement to ensure that the correct rate was entered in box 14b.
16. Box 15 of the OF-286 should be completed if the applicable agreement includes a special rate, such as mileage, that the vendor is entitled to.
17. Box 16 of the OF-286 is the total of boxes 14c and 15c. Always double check the total is correct.
18. Box 17 of the OF-286 is only completed if the applicable agreement includes a daily guarantee for the vendor. If the agreement does not list a guarantee then the vendor does not have a guarantee and Box 17 should be left blank.
19. Box 18 is the greater of the amounts in Box 16 or 17. If the vendor has a guarantee they are entitled to that guarantee if it is more than the work rate total of Box 16. If the total of Box 16 is greater than the guarantee the vendor is entitled to the amount in Box 16. The vendor is entitled to the amount in either Box 16 or 17, but not the total of both.
  - a. Ensure that there is a corresponding shift ticket for each day entered.
  - b. Ensure the rate information for each day under hire is correct. Some agreements may have different rates that could impact the daily total depending on circumstances. For example, a portable toilet vendor may have a serviced daily rate and an unserviced daily rate. If the vendor is servicing toilets every other day, their rate would be higher for the days they are providing service, and lower for the days they are not providing service.
  - c. Check shift tickets to determine if there were any periods of time for which the vendor was out of service due to breakdowns. Breakdowns periods are calculated in accordance with the terms and conditions of the agreement and the vendor does not receive a full daily rate if they were out of service for a period of time.
  - d. For the first and last day of hire, if the vendor was under hire for less than 8 hours they are entitled to a 1/2 day rate per the terms and conditions of their agreement. The 1/2 day rate only applies to the first and last day and does not affect the days in between.
  - e. The vendor may be entitled to a double shift rate only if they provide two operators and were ordered by the government as a double shift. This should be documented on the

resource order or in a general message. The double shift calculation is included in the terms and conditions of the agreement even if a double shift rate is not included in the rates on the agreement.

- f. Contracted resources are not entitled to lodging or M&IE for their travel to/from an incident. If the government is unable to provide a camp and/or meals the vendor is entitled to lodging reimbursement and M&IE in accordance with the current GSA per diem rates for their days that they are not in travel status.
  - g. Some vendors have a mileage rate and a daily guarantee rate for mobilization. Check the contract, the vendor is likely entitled to either the mileage or the guarantee, whichever is higher, but not both.
- 20. Box 19 of the OF-286 should include the fire code listed on the resource order for the contractor.
  - 21. Box 23 of the OF-286 is the total of all days included on the OF-286, double check the calculation.
  - 22. Box 24 of the OF-286 should include a total if the invoice includes more than one OF-286 page (days under hire exceed the number of rows available on one OF-286). If there is only one OF-286 page this box should remain blank.
  - 23. Box 25 of the OF-286 is the total of Boxes 23 and 24, double check the calculation.
  - 24. Box 26 of the OF-286 is the total deductions to the invoice, if applicable. The deductions should be itemized and supporting documentation (such as fuel issue tickets) should be included to justify the deduction. Double check the terms and conditions of the agreement to ensure that deductions are appropriate and that the government was not required to provide anything under the agreement.
  - 25. Box 27 of the OF-286 is the total additions to the invoice, if applicable. The additions should be itemized and supporting documentation (such as fuel issue tickets) should be included to justify the addition. Double check the terms and conditions of the agreement to ensure that additions are appropriate and that the Contractor was not required to provide anything under the agreement.
  - 26. Box 28 of the OF-286 is the total in Box 25 less the deductions in Box 26 plus the additions in Box 27. (Box 25 - Box 26 + Box 27). Double check the calculations.
  - 27. Box 21 of the OF-286 should clearly indicate whether the equipment was released or withdrawn and the resource order should indicate this information as well, including the date and time. If the equipment was withdrawn by the vendor there should be additional documentation, such as a general message, from the incident that explains this. Check the terms and conditions to determine if a vendor is entitled to payment to return to their point of hire if they have withdrawn their equipment and were not released by the government.
  - 28. Box 30 of the OF-286 is the signature of the contractor, or their equipment operator, after they review the invoice for correctness. Box 31 is the date of their signature and Box 34 is their name and title.
  - 29. Box 32 of the OF-286 is the signature of the receiving officer that is closing out the OF-286 invoice. Box 33 is the date of their signature and Box 35 is their name and title.
  - 30. If any corrections are necessary, the Approving Official should use a single line to cross out the incorrect information, write in the correct information, and initial the change. The vendor should also be notified of the change especially if the change reduces the overall amount of the invoice. Before decreasing a charge make sure you have reviewed the agreement to be sure the change is correct. If the agreement is ambiguous it is recommended you contact the Contracting Officer on the agreement to get clarification on how the rate or terms should be applied.

31. The Approving Official should sign and date the audited invoice package and prepare it to be sent to the Payment Office.
  - a. Assign a document control number to the invoice.
  - b. Include the full cost code that the invoice payment should be applied to.
  - c. Email approved invoice with supporting documentation to the Reston payment team at [ia\\_cfo\\_firepayments@bia.gov](mailto:ia_cfo_firepayments@bia.gov) for payment.



**Attachment A**  
**BIA Regional Offices**

BIA Great Plains Region  
115 4th Ave. SE, Ste 400  
Aberdeen, SD 57401

Regional FM O: Raymond Hart  
Fire Business: Diane Cartney

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BIA Southern Plains Region  
WCD Office Complex  
PO Box 368  
Anadarko, OK 73005

Regional FMO: Brian Tonihka

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BIA Rocky Mountain Region  
20214th Avenue North  
Billings, MT 59101

Regional FMO: Bryce Rogers  
Fire Business: Amanda Boatright

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BIA Alaska Region  
PO Box 21647  
709 West 9th Street  
Juneau, AK 99802

Regional FM O: Jason Dollard

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BIA M Midwest Region  
Norman Pointe II Building  
5600 W. American Blvd., Suite 500  
Bloomington, MN 55437

Regional FMO: Tom Remus  
Fire Business: Cristine Basina

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BIA Eastern Oklahoma Region  
PO Box 8002  
3100 W. Peak Blvd.  
Muskogee, OK 74401

Regional FM O: Forrest Blackbear  
Fire Business: Bobbi Jo Crooch

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BIA Western Region  
2600 N. Central Ave.  
Phoenix, AZ 85001

Regional FMO: Carlos Nosie  
Fire Business: Carletta Coochwytewa

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BIA Pacific Region  
2800 Cottage Way  
Sacramento, CA 95825

Regional FMO: Joshua Simmons  
Fire Business: Julie White

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BIA Southwest Region  
1001 Indian School Road NW  
Albuquerque, NM 87104

Regional FM O: John Cervantes  
Fire Business: Lorraine DeWahe

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BIA Navajo Region  
PO Box 1060  
301 West Hill Street  
Gallup, NM 87301

Regional FMO: Dale Glenmore Fire  
Business: Katherine Ridenour

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BIA Northwest Region  
911 Northeast 11th Ave.  
Portland, OR 97232

Regional FMO: Darron Williams  
Fire Business: Regina Hoffmann

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BIA Eastern Region  
545 Marriott Drive, Suite 700  
Nashville, TN 37214

Regional FMO: Lucas Minton

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