



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS

Washington, DC 20240

Memorandum

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

From: Director, Bureau of Indian Affairs

Subject: 2025 DOI Wildland Firefighter Medical Standards Program Implementation for Tribal Wildland Fire Programs

This memorandum provides Bureau of Indian Affairs (BIA) implementation guidance for the Department of the Interior's Wildland Firefighter Medical Standards Program (DOI MSP) as it applies to Tribally managed wildland fire programs which operate under an agreement with the Bureau of Indian Affairs and/or utilizes wildland fire qualifications through the Incident Qualifications Certification System (IQCS) from the BIA. This memorandum supersedes BIA Division of Fire Management (DWF) memorandum FMB2021007 dated January 5, 2021, and remains valid until rescinded or replaced.

The DOI MSP was established to ensure that DOI Bureau's responders performing arduous wildland firefighting duties are medically qualified to do so safely and effectively with a goal to reduce injury and health risks by applying consistent medical standards across agencies. All personnel pursuing fire qualifications—whether light, moderate, or arduous—must comply with DOI MSP protocols. These standards apply across permanent and seasonal staff, administratively determined personnel, Law Enforcement Officers, and supplemental fire resources (Federal Employees). The BIA adopted the DOI MSP program for implementation for Tribal personnel issued qualifications through IQCS from the BIA.

Starting August 11, 2025, the DOI MSP transitioned to a new medical qualification vendor that will manage all wildland fire medical standards processes and exams, including a portal for requesting exams, completing self-certifications, and printing medical qualification certificates required for the work capacity test. Per DOI information technology and security policy, administrative access to the new medical standards portal will be restricted to DOI employees with a DOI email only.

To comply with policy and system access requirements, each Region will be required to adopt one of two options for managing medical standards across Tribal wildland fire programs within their jurisdiction. The options are briefly described below and are discussed in detail in the attachments:

Option 1: BIA-Managed Medical Standards Program

- The BIA administers medical standards and program oversight on behalf of participating Tribes, using DOI systems.
- BIA personnel carry out the necessary workload and compliance responsibilities for tribal fire personnel.
- This option does not allow access to the MSP portal for personnel that are not DOI employees and do not have a DOI email.
- Please note that this option may raise concerns or violation of the Health Insurance Portability and Accountability Act (HIPAA), specifically as it relates to Protected Health Information (PHI) and Personally Identifiable Information (PII) of Tribal employees.

Option 2: Tribe-Managed Medical Standards Program

- Tribes assume full responsibility for ensuring total compliance with all applicable DOI medical standards by developing and operating their own internal medical standards process/program.
- Responsibilities include personnel funding, documentation, training, and annual certification for all tribal fire personnel.
- The program may utilize DOI components or be entirely designed by the tribe, provided it meets or exceeds DOI requirements.
- Final approval must be obtained from the BIA Regional Office.
- Programs are subject to annual review and certification to ensure continued compliance. Tribal Programs and respective BIA Office must have a procedure established to verify compliance with DOI Medical Standards for issuance of IQCS qualifications from the BIA.
- Please note that this option does not raise concerns or violation of HIPAA, PHI, or PII of DOI or Tribal employees.

Each Region must provide a memorandum to the DWFM, attention BIA Preparedness and Medical Program Lead, indicating which option - Option 1 (BIA-Managed) or Option 2 (Tribe-Managed) – has been selected for implementing a Medical Standards program that meets or exceeds the DOI MSP. This memorandum must also include an implementation plan detailing how the selected option will be carried out within the Region.

1. If Option 1 is selected, the Region must acknowledge acceptance of potential liability related to the handling of HIPAA, PHI, and PII.
2. If Option 2 is selected, the Region must provide an outline of how the Tribe's Medical Standards program will meet or exceed DOI MSP, along with a description of how the respective BIA Office will ensure ongoing compliance with the DOI MSP.

Regional memorandums are due no later than October 1, 2025, to ensure timely and full compliance. Failure to comply with this requirement will result in the withholding of any MSP and IQCS fire qualifications for Tribal wildland fire personnel. Personnel who are not covered under a compliant medical standards program will be deemed NOT Fireline eligible due to not meeting established medical requirements (i.e. not fit for duty). This will directly impact their fire qualifications and availability.

We understand that these changes in process may raise concerns or frustrations. Please know that the DWFM, in close coordination with the DOI Office of Wildland Fire, has worked diligently to ensure that all necessary requirements related to Information Technology security, HIPAA, PHI, PII, and other applicable legal obligations are addressed.

For further information regarding the DOI MSP or questions regarding this memorandum, please contact Anthony Gholson, BIA Preparedness and Medical Program Lead at 208-484-8878, anthony.gholson@bia.gov, or Troy Phelps, BIA Wildland Fire Safety Program Manager at 208-803-1662, troy.phelps@bia.gov.

Attachments: DOI Medical Standards Process
Federal Interagency Wildland Firefighter Medical Standards
MSP Provider Guidance Letter
Wildland Firefighter Essential Functions and Work Conditions Information

CC: Directorate, Environment and Natural Resources