



U.S. Department of Agriculture

Office of Inspector General



Forest Service Firefighting Safety Follow-Up

**Audit Report 08601-58-SF
September 2010**



DATE: September 30, 2010

REPLY TO
ATTN OF: 08601-58-SF

TO: Thomas L. Tidwell
Chief
Forest Service

ATTN: Donna M. Carmical
Chief Financial Officer

FROM: Gil H. Harden /s/
Assistant Inspector General
for Audit

SUBJECT: Forest Service Firefighting Safety Follow-Up Audit

Summary

Due to ongoing Congressional and public concern over firefighter safety and the Forest Service's (FS) continued use of contract crews, we conducted a follow-up audit on two prior OIG audits: Firefighting Safety Program (08601-38-SF, issued September 2004) and Firefighting Contract Crews (08601-42-SF, issued March 2006). The objective of our audit was to determine whether FS timely and adequately implemented the corrective actions as agreed.

The two prior audits identified 9 issues and made 18 recommendations to enhance firefighter safety and strengthen FS controls over contract crews. While FS took significant steps towards implementing the recommendations, it did not adequately implement two recommendations for the Firefighting Safety Program audit and two recommendations for the Contract Crews audit.

For the Firefighting Safety Program audit, we recommended that FS develop a consolidated tracking system that included all wildfire Accident Prevention and Hazard Abatement Plan action items, as well as any recommendations from audits or internal reviews related to firefighter safety. FS agreed but did not establish adequate controls to ensure all items were captured and, consequently, some required safety information was overlooked. We also recommended FS direct line officers to order administrative investigations for wildfire incidents when there is evidence of firefighter misconduct or serious violation of safety standards. FS agreed and issued an interim directive, but has not implemented a permanent policy.

For the Contract Crews audit, we recommended that FS establish procedures to ensure the adequate review of contract crew firefighter qualification records. FS agreed and hired a

contractor to conduct the review. While the contract details were sufficient to ensure that key personnel were qualified and fit for duty, FS did not issue agency-wide procedures to ensure that future reviews will be adequate. We also recommended that FS ensure contractor associations restrict access to electronic training records to personnel who did not have an interest in any contractor's business. During the current audit, FS requested a change in management decision that stated existing controls should be sufficient to close the recommendation. However, we determined that the controls were not a sufficient alternative correction action and, consequently, the recommendation has not been implemented.

We also interviewed 15 incident commanders (ICs) from 7 of the 9 FS regions to determine if they had any concerns about contract crew qualifications, performance, or adherence to safety standards.¹ The ICs with recent contract crew experience² expressed either a positive opinion or no opinion about these matters. In addition, crew evaluations are completed at the incident and sent to the FS contracting officer who, in turn, uses them during preseason inspections of contract crew qualifications.

Background

Wildfires have intensified in recent years. From 2006 through 2008 there were 262,274 wildfires that consumed more than 24 million acres nationwide. Furthermore, there were 58 fatalities associated with wildfires in the same period. In response, Congressional funding to prepare for and respond to wildfires has increased over the past decade to about \$2 billion annually. However, no single agency has the resources to fight all wildfires on land for which it is responsible. Since wildfire incidents respect no boundaries, the need for uniform policies and strong relationships between Federal and State agencies becomes increasingly important for the safety of all wildland firefighters.

To combat wildfires, FS uses its in-house firefighting personnel and contract crews, as well as crews and personnel from other agencies. FS personnel at the National Interagency Fire Center (NIFC) administer contracts that provide the services of 20-person crews for use nationwide.³ These crews provide protection services to include, but not limited to, wildland fire suppression, prevention, and rehabilitation. FS also uses firefighting crews provided through interagency agreements managed by the Oregon Department of Forestry (ODF).

FS firefighting personnel may qualify for one or more positions within the Incident Command System (ICS)⁴ by meeting National Wildfire Coordinating Group (NWCG) training and experience requirements. The NWCG was established by Federal agencies and developed safety policies and training courses that have become the standard across the wildfire suppression community. By agreement, these standards are adhered to by Federal agencies, State

¹ ICs are responsible for the overall management and organization of the emergency response to an incident.

² We defined recent experience as working with contract crews on incidents between 2006 and 2008.

³ The FS Incident Support Branch for Acquisition Management is a detached Washington Office Unit located at NIFC's offices in Boise, Idaho. The unit is responsible for contracting "National Shared Resources" to be used for wildland fire suppression, prevention, and other emergency incident response activities.

⁴ ICS is the standard organization in the field for fighting wildfires.

cooperators, and private contractors to ensure uniform qualifications among wildland firefighters.

Based on overall firefighter safety concerns and numerous problems with poorly trained and inexperienced crews, we conducted two audits. The Firefighting Safety Program audit assessed FS' controls for implementing safety recommendations, ensuring compliance with firefighting safety standards, and coordinating with other firefighting agencies to improve safety practices. The Firefighting Contract Crews audit evaluated FS' administration of firefighting crew contracts, as well as its coordination with other parties that administer contracts for firefighting crews.

Objective

The objective of our audit was to determine whether FS timely and adequately implemented the corrective actions agreed to under our Firefighting Safety Program and the Contract Crews audits.

Scope and Methodology

Our audit covered FS firefighting personnel and contract crews operating during the 2006 through 2008 fire seasons. Fieldwork was performed from February 2009 through February 2010 at NIFC in Boise, Idaho; the ODF in Salem, Oregon; and selected FS regional offices and national forests (NF). We also visited the offices of selected contractors who provided firefighting crew services to FS. (See Exhibit A for a list of all sites visited.)

We judgmentally selected Regions 5 and 6 based on the number of contract crews administered through national agreements, the portion of the total wildfire preparedness allocations during the 2006 through 2008 fire seasons, and the number of serious fire accidents that occurred during the same timeframe. There were a total of 12 serious fire accidents nationwide that resulted in fatalities or injuries to FS personnel, burnovers, entrapments, or deployed shelters.⁵ For Region 5, we selected the Klamath and Los Padres NFs based on where serious accidents occurred. For Region 6, we selected the Wenatchee and Deschutes NFs because these NFs were reviewed in the Firefighting Safety Program audit.

We selected five contractors based on the number of incidents they participated in, and the amount of money awarded by FS during the 2006 through 2008 fire seasons. These contractors received between \$327,000 and \$4.5 million annually within that timeframe. Since this is a follow-up audit, we limited our selection to one national and four State contractors (versus five national and five State contractors in the Contract Crews audit).

⁵ We excluded vehicular accidents and fatalities that were a result of natural causes.

To accomplish our objective, we performed the following:

- Reviewed pertinent regulations, policies, procedures, national firefighting crew contracts, and interagency agreements pertaining to firefighting safety standards to understand relevant criteria.
- Contacted the Office of the Chief Financial Officer (OCFO) of the Department of Agriculture to determine the status of the 18 recommendations for the Firefighting Safety Program and the Contract Crews audits. (See Exhibit B for a list of the recommendations and agency responses from the Firefighting Safety Program audit, and Exhibit C for a list of the recommendations and agency responses from the Firefighting Contract Crews audit.)
- Interviewed FS officials at NIFC, two regional offices, and four NFs to evaluate the corrective actions implemented for enhancing the safety of contract crews and FS firefighting personnel and to determine the reasons why any corrective actions have not been implemented.
- Interviewed ODF staff to evaluate its corrective actions regarding certification, training, and hiring of contract crews through the national interagency agreement(s).
- Reviewed records of selected firefighting personnel at the four NFs and five contractor offices to test and verify whether corrective actions regarding recordkeeping, certification, re-certification, training, and hiring practices were implemented.
- Interviewed 15 ICs to determine if they had current concerns regarding FS' use of contract crews during wildfires. These ICs either had experience on serious accidents or were chosen from different FS regions.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Finding 1: FS Did Not Timely or Sufficiently Implement Four Prior Recommendations

FS did not fully implement 4 of 18 corrective actions as agreed to in OIG's Firefighting Safety Program and Firefighting Contract Crews audit reports. While FS took significant steps towards achieving most corrective actions, it did not establish sufficient emphasis or controls to implement all recommendations. As a result, firefighter safety may still be compromised.

Departmental Regulation 1720-1, dated April 22, 2002, requires that the agency “ensure final action is achieved as agreed upon in the management decision.”⁶ Final action should generally be achieved within 1 year from the date of the management decision, or agencies must report “the reason final action is not complete for the audit and a revised completion date.”

The Firefighting Safety Program and Contract Crew audits identified several issues that could have adversely affected firefighter safety. Many of the issues related to FS’ lack of oversight to ensure safety enhancements were implemented, and FS firefighting personnel and its contract crews were qualified and fit for duty. FS agreed to all recommendations.

FIREFIGHTING SAFETY PROGRAM

The Firefighting Safety Program audit was conducted to (1) assess FS’ controls to implement recommendations based on investigative findings, accident prevention plans, and other information; (2) assess FS’ controls to ensure compliance with firefighting safety standards; and (3) evaluate FS’ coordination with other wildland firefighting agencies to improve safety practices. The audit identified four issues and made nine recommendations. While management decision was reached on all of the recommendations, the following recommendations were not implemented or fully implemented as agreed to by FS:

- Tracking System

In the prior audit, we found FS lacked comprehensive status information for South Canyon and Thirtymile action items because it did not have a consolidated system to track and monitor their implementation. While FS created a staff position and was in the process of developing a consolidated tracking system, which consisted of a series of spreadsheets that identified the status of each action item, it was too early for OIG to confirm whether the system included all of the necessary information. Therefore, we recommended that FS “develop a consolidated tracking system that includes all wildfire and Accident Prevention Action Plan and Hazard Abatement Plan action items as well as any recommendations from audits or internal reviews that relate to firefighter safety.” FS agreed to refine its system to include “all service-wide recommendations and action items that relate to firefighter safety.” Based on this, we reached management decision for this recommendation on September 23, 2004, and OCFO accepted final action on August 8, 2006.

In the current audit, we found that the system is essentially the same today as when it was designed, and it primarily tracks recommendations from fire-related audit reports and any incidents with associated abatement plans. However, the 2006 Esperanza fire, which resulted in five firefighter deaths and seven action items, was not included in the system. FS stated the oversight was due to the responsible staff position being vacant for more than a year.

⁶ Management decision is an agreement between agency management and OIG on the actions(s) taken or to be taken to address a finding and recommendation cited in an audit report. Final action is the completion of all actions that management has concluded, in its management decision, are necessary with respect to the findings and recommendations included in an audit report.

While FS has now refined the system as agreed, it still needs to establish additional internal controls to ensure that all required information is captured and monitored within the tracking system and not dependent on one staff position.

- Professional Peer Reviews

In the prior audit, we found that FS directives did not require administrative investigations to be conducted when there was evidence of fire safety violations that did not result in fatalities. OIG determined that FS may be missing opportunities to prevent future accidents; therefore, we recommended FS “direct line officers to order administrative investigations for wildfire incidents referred to the Washington Office when there is evidence of firefighter misconduct or serious violation of safety standards, or to document their rationale for not ordering such investigations.” FS agreed “to draft new policy to establish a ‘Professional Peer Review’ panel to review all incidents with evidence of misconduct or violation of safety standards or policy.” Based on this, we reached management decision for this recommendation on September 23, 2004.

In the current audit, we found FS did not implement a permanent policy that creates a panel to review incidents with evidence of misconduct or violations of safety standards. While it has been revising several subject areas in its Wildland Fire Suppression Manual, which will also ultimately address OIG’s recommendation, FS decided to withhold issuance of the entire directive until all of the refinements were made. FS recognized, however, that it was necessary to provide direction in a timelier manner, so it issued an interim directive that was effective January 13, 2010, and expires July 13, 2011 (by which time the directive should be incorporated in the manual). Based on this, OCFO accepted final action on January 28, 2010.

While the interim directive does address the original recommendation, FS needs to ensure that it is incorporated in its Wildland Fire Suppression Manual before the expiration date of July 13, 2011, or FS will need to extend the directive until it is incorporated.

FIREFIGHTING CONTRACT CREWS AUDIT

The Contract Crew audit was conducted to evaluate the effectiveness of FS’ direct administration of private firefighter crew contracts and FS’ coordination with other parties that administer contracts for crews that fight wildfire on FS land. The audit identified five issues and made nine recommendations. While management decision was reached on all of the recommendations, the following recommendations were not implemented or fully implemented as agreed to by FS:

- Procedures to Ensure Adequate Review of Crew Qualifications

In the prior audit, we found no evidence that FS conducted contract crew qualification reviews. Consequently, we recommended that FS “establish and implement procedures to ensure adequate review of firefighter qualification records and monitoring of work capacity testing for national contract firefighting crews as part of pre-season inspection.” FS agreed

that “no awards will be made on the national contract without review of the qualification records of key personnel.” Based on this, we reached management decision for this recommendation on March 14, 2006, and OCFO accepted final action on May 28, 2008.

In the current audit, we found that FS did not create agency-wide procedures to ensure that qualification records of key crew personnel were reviewed. Instead, FS elected to hire a company to conduct the reviews, and provided direction and guidelines within the separate contract. Although the crew contracts will expire in 2010, the agency has yet to decide if it will conduct future reviews itself or hire another company to do so. In the absence of agency-wide procedures, FS lacks guidance and sufficient controls to ensure the crew members are qualified and fit for duty if it elects to conduct the future reviews.

FS needs to incorporate agency-wide procedures in an FS manual or handbook that outlines how contract crew qualifications will be reviewed.

- Associations’ Privileges to Create and Modify Training Records

In the prior audit, we found that associations’ instructors, who may be the owners and employees of contract crews, had sole authority to create and modify contractor employee records in the association databases. The integrity of the records may have been vulnerable with unchecked access to association databases. Therefore, we recommended that FS “ensure that associations restrict privileges to create and modify electronic training records to personnel who do not have an employment or financial interest in any contractor’s business.” FS agreed and stated “the associations’ agreement will be modified to address this requirement.” Based on this, we reached management decision for this recommendation on March 14, 2006.

During the current audit, FS requested a change in management decision. While it did not modify the associations’ agreement, it stated that existing “controls, processes, and monitoring implemented in the Memorandum of Understanding (MOU) between the Pacific Northwest Wildfire Coordinating Group and various Firefighting Contract Associations” should be sufficient to close the recommendation.

After reviewing the MOU and other supporting documentation, we determined that the existing controls, processes, and monitoring did not sufficiently address the recommendation because FS still did not segregate duties. FS subsequently agreed to modify the MOU to require a segregation of duties, but did not think it would be cost effective or realistic to require associations to employ additional personnel for this purpose. During our audit, we examined the qualification records for 28 contractor employees and found that there has been significant improvement in agency oversight of contractor employee training, certification, and recordkeeping. Based on this, we agree that it is not necessary for associations to employ additional personnel in order to restrict database privileges as recommended in the original audit.

For final action, FS needs to modify the MOU and require a segregation of duties between the instructors that issue the certifications and the personnel that enter the information into the associations' databases.

FS timely and adequately implemented seven of nine corrective actions for the Firefighter Safety Program audit and seven of nine corrective actions for the Contract Crews audit. While it made significant progress in achieving all actions, four were not adequately implemented due to insufficient controls, planning, and oversight. Consequently, FS must implement additional controls to ensure the recommendations are fully addressed.

We discussed the above issues with FS officials on August 24, 2010. They generally concurred with our position and recommendations.

Recommendation 1

Establish additional controls for the consolidated tracking system to ensure required information is captured and monitored.

Agency Response

The FS concurs with this recommendation. In a letter dated September 27, 2010, FS stated that it initiated a new tracking chart for accidents, called "Forest Service National Headquarters Monitoring of Serious Accident and Fatality Actions." This will track the following: incident name and date of occurrence, type of incident, brief description, recommendations for FS action, due date for recommendations, actions taken by FS (including who is implementing recommendations) and date of completed action. The Risk Management staff in Boise will identify those incidents that require national tracking and will report those to the Fire and Aviation Management's Planning and Budget staff. FS will begin using this new system immediately.

OIG Position

We accept FS' management decision on this recommendation.

Recommendation 2

FS needs to ensure that its interim directive, which establishes a Professional Peer Review panel to review all incidents with evidence of misconduct or violation of safety standards or policy, is incorporated into its Wildland Fire Suppression Manual before the expiration date of July 13, 2011, or FS will need to extend the directive until it is incorporated.

Agency Response

The FS concurs with this recommendation. The interim directive language is included in the revision of the entire chapter of the FS Manual, FSM 5100 – Fire Management, Chapter 5130 – Wildland Fire Suppression. The estimated completion date is November 30, 2010.

OIG Position

We accept FS' management decision on this recommendation.

Recommendation 3

Implement and provide OIG with a copy of a formal written policy in FS' manual or handbook that outlines how contract crew qualifications will be reviewed.

Agency Response

The FS concurs with this recommendation. The FS will include the written policy in the revision of the FS Handbook, FSH 5109.17. The estimated completion date is August 31, 2011.

OIG Position

We accept FS' management decision on this recommendation.

Conclusion

Your September 27, 2010, response to the official draft report is included at the end of this report. Based on the information in the response, we have accepted your management decision for all of the report's recommendations. Please follow your internal agency procedures in forwarding final action correspondence to OCFO.

We appreciate the assistance and cooperation of your staff during our review.

Exhibit A: Sites Visited

ORGANIZATION	LOCATION
FS National Coordination National Interagency Fire Center	Boise, Idaho
FS Regional Offices Region 5 Region 6	Vallejo, California Portland, Oregon
FS National Forests Klamath Los Padres Okanagan-Wenatchee Deschutes	Yreka, California Goleta, California Wenatchee, Washington Bend, Oregon
FS State Cooperator Oregon Department of Forestry	Salem, Oregon
FS National Contractor Contractor 1	Redmond, Oregon
State Contractors Contractor 2 Contractor 3 Contractor 4 Contractor 5	Roseburg, Oregon Aumsville, Oregon Salem, Oregon Salem, Oregon

The table above shows the sites visited.

Exhibit B: Firefighting Safety Program Prior Audit Recommendations

No.	Recommendation	Agency Response ⁷
1	Establish realistic completion dates for the remaining 27 Accident Prevention Action Plan and Hazard Abatement Plan items for the South Canyon and Thirtymile Fires and take the appropriate management action to meet the dates.	FS provided an interim status report dated October 22, 2004. It also addressed the remaining outstanding items, discussing work that is in process or work that is planned for each item, as well as time frames for completing work.
2	Develop a consolidated tracking system that includes all wildfire Accident Prevention Action Plan and Hazard Abatement Plan action items as well as any recommendations from audits or internal reviews that relate to firefighter safety.	The Hazard Abatement Certification process provides the basis for a tracking system. FS is refining and expanding the system to include all recommendations and action items relating to firefighter safety.
3	Designate a high level official to oversee the tracking system and to coordinate timely completion of all action items and recommended corrective actions with responsible staff.	The Director of Fire and Aviation Management is the designated official to oversee the tracking system and timely completion of all action items and recommendations.
4	Issue guidance on the firefighter qualification documentation that must be maintained in order to be in accordance with FSH 5109.17.	FS will issue a letter to all field offices that reiterates the policy in the Fire and Aviation Management Qualifications Handbook, FSH 5109.17, Chapter 20 – Qualification and Certification regarding the type of documentation that must be kept to ensure that firefighters have the appropriate skills and experience to perform the work for which they have been issued credentials. Included in the letter will be direction concerning the location where the documents are to be stored.
5	Establish controls to verify the accuracy and sufficiency of firefighter qualification documentation, in accordance with FSH 5109.17 and related guidance.	A training officer checklist, which includes recordkeeping and documentation requirements found in 5109.17 will be provided to all field units in preparation for annual preparedness reviews for the 2005 fire season. FS will issue a letter to all field offices, reiterating Line Officer responsibilities found in FSM 5126, for “ensuring employees meet all applicable training, experience, and other qualifications standards prior to certification for wildland fire management positions” with the checklist attached.
6	Issue guidance on procedures needed to reestablish credentials for firefighters who were not able to satisfy requirements of FSH 5109.17.	Included in the letter to all field units, will be procedures to reestablish credentials for firefighters who were not able to satisfy requirements of FSH 5109.17, with a compliance due date of May 2005.

⁷ We confirmed that FS implemented all corrective action in its Agency Response, except for Recommendations 2 and 8 (see Finding 1).

No.	Recommendation	Agency Response
7	Establish controls to ensure that only valid and supportable Redcard System data is converted to the Incident Qualification Certification System (IQCS).	Qualifications that were listed in Redcard which did not have matching supporting data entries (task book initiation and certification dates and/or experience records for that position) did not post to IQCS. Account managers were required to enter the supporting data prior to the qualification being reflected on the IQCS Redcard or provide an override which requires a justification statement by the Certifying Official (Forest Fire Program Manager). Utilization of the Training Officer's checklist in annual preparedness reviews will serve as a control to begin to audit and verify maintenance and accuracy of records on FS units.
8	Direct line officers to order administrative investigations for wildfire incidents referred to the WO when there is evidence of firefighter misconduct or serious violation of safety standards, or to document their rationale for not ordering such investigations.	In its January 4, 2005, memorandum (which we accepted management decision for), FS proposed to draft new policy to establish a "Professional Peer Review" panel to review all incidents with evidence of misconduct or violation of safety standards or policy. The panel may consist of a human resources employee, fire operators, and an agency operator from another unit. The panel will review the circumstances and decisions made by the FS employee, compare those to proper operating procedures, and determine if the matter was a performance, or conduct issue. The findings will be documented along with recommended actions. FS plans to work out details for the panel through coordination with Fire and Aviation Management and Human Resources staffs and employee union representatives.
9	Develop safety performance standards for all firefighting personnel and for those responsible for providing safety oversight, supervision, and management.	On May 24, 2004, FS issued direction to include supplemental safety performance standards for Forest Supervisors, District Rangers, Supervisors, Managers, and Fire Program Leaders. The supplemental performance standards specifically cite "consistent adherence to the Standard Fire Orders and mitigation of the Watch Out Situations." Application of the standards to non-supervisor firefighters will be in accordance with labor-management obligations.

The table above shows the recommendations and agency responses from the Firefighting Safety Program audit.

Exhibit C: Firefighting Contract Crews Prior Audit Recommendations

No.	Recommendation	Agency Response ⁸
1	Establish and implement procedures to ensure adequate review of firefighter qualification records and monitoring of work capacity testing for national contract firefighting crews as part of pre-season inspection.	No awards will be made on the national contract without review of the qualification records of key personnel. Additional actions will be coordinated with the Pacific Northwest Wildfire Coordinating Group (PNWCG). This new process will be established and implemented by the Oregon Department of Forestry and the FS, as they process new contract awards. Adjustments are likely as lessons are learned from the implementation. Much of this review and monitoring work will be contracted.
2	Modify the national contract to incorporate experience requirements from the Oregon Department of Forestry (ODF) agreement.	These experience requirements will be included in the 2006 national contract solicitation that is in progress.
3	Specify minimum training and experience prerequisites for the Incident Commander Type 5 position in the national contract.	The qualification standard used in the 2006 contract solicitation is the National Wildfire Coordinating Group's Guide No. 310-1, which contains the minimum training and experience prerequisites. Per the policy described in this document, an agency or a vendor has the authority and is accountable for employees they certify. If the government allows the contractor employee to perform as an ICT5, on small fires for example, another ICT5 or individual (including contractor employees) with higher operations qualification can evaluate performance.
4	Provide position task book training which should include training documentation requirements for all contractors.	Training materials are available online at the National Wildfire Coordinating Group's website at: http://www.nwcg.gov . For task books on firefighter positions and for Incident Commander Type 5 (ICT5) task book see the two websites listed below. The contract will state that completion of these modules will be required for task book administrators and that contractors must maintain documentation of their completion of the training. Pre-work meetings will emphasize the importance of task book administration. http://www.nwcg.gov/pms/taskbook/operatio/operatio.htm http://www.nwcg.gov/pms/taskbook/command/command.htm
5	Verify that the associations' training sessions receive sufficient monitoring to ensure they are in accordance with NWCG's standards.	FS work will be accomplished in conjunction with the PNWCG, as we all share in the requirement. Various agency personnel, such as training specialists from the FS and ODF, will be assigned to monitor training once a training plan is developed. The plan on how we will monitor the session will be completed by September 30, 2006.

⁸ We confirmed that FS implemented all corrective action in its Agency Response, except for Recommendations 1 and 6 (see Finding 1).

No.	Recommendation	Agency Response
6	Ensure associations restrict privileges to create and modify electronic training records to personnel who do not have an employment or financial interest in any contractor's business.	The contract will be modified to address this requirement. Certifications will not be approved without compliance with this requirement. A monitoring program will be established by FS and ODF.
7	Adopt ODF's standardized field language assessment for national contract crews.	The provision has been included in the 2006 national crew contract.
8	Ensure that the PNWCG completes the pre-season language assessment and certification, and is ready to implement the procedure for the 2006 fire season. Coordinate with PNWCG to adopt the procedure for national contract crews.	To implement this recommendation, a pilot test with a local community college was planned to utilize "English as a second language" programs to provide certification. Pending results of the pilot, FS would then expand the pilot to address program needs. However, when approached with this plan, the industry balked at the cost to implement the recommendation; the cost would be too much for the industry to bear. Consequently, FS will need to work with ODF to determine how best to implement this recommendation. FS plans to implement this recommendation by the 2007 fire season.
9	Coordinate with Government agencies having relevant regulatory or enforcement authority in order to develop expedited procedures for identifying counterfeit documents used to obtain employment on contract crews.	FS will provide information to the industry on checking for compliance using the Social Security Online Employee Reporting Instructions and Information processes at the website listed below. All personnel involved with the administration of the crew contract are required to comply with the Chief's letter, subject "Contract Administration," dated November 18, 2005. The letter requires personnel to closely monitor service contracts for health, safety, and wage violations and immediately notify cognizant federal enforcement authorities if such violations are witnessed or suspected. In addition, the 2006 crew contract will include the required contract provisions on personal protective equipment, camping provisions, and the Migrant and Seasonal Agricultural Worker Protection Act as specified in the Washington Office Director of Acquisition Management letter, subject "Service Contract Provisions," dated January 4, 2005. http://www.ssa.gov/employers/ssnv.htm

The table above shows the recommendations and agency responses from the Contract Crews audit.

USDA'S

FOREST SERVICE

RESPONSE TO AUDIT REPORT



Forest
Service

Washington
Office

1400 Independence Avenue, SW
Washington, DC 20250

File Code: 1430

Date: September 27, 2010

Route To:

Subject: Response to Office of the Inspector General Draft Report Number 08601-58-SF,
"Forest Service Firefighting Safety Follow-Up"

To: Gil H. Harden, Assistant Inspector General for Audit, Office of Inspector General

The Forest Service has reviewed the Office of the Inspector General (OIG) Draft Audit Report No. 08601-58-SF, "Forest Service Firefighting Safety Follow-Up." The Agency appreciates OIG's follow-up review to determine whether the Forest Service has timely and adequately implemented the corrective actions agreed to in OIG Audit Report No. 08601-38-SF, "Forest Service Firefighting Safety Program" and OIG Audit Report No. 08601-42-SF, "Forest Service Firefighting Contract Crews." The Forest Service generally agrees with the finding and recommendations.

The enclosed response outlines our proposed actions for each of the report recommendations. Please contact Donna Carmical, Chief Financial Officer, at (202) 205-1321 or dcarmical@fs.fed.us with any questions.

/s/ Thomas L. Tidwell
THOMAS L. TIDWELL
Chief

Enclosure

cc: Erica Kim
Wm C Waterbury
Neal Hitchcock
Roger P Pigeon
Janet M Roder



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USDA Forest Service (FS)

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Office of Inspector General (OIG) Discussion Draft Audit Report No. 08601-58-SF
Forest Service Firefighting Safety Follow-up

August 24, 2010

FS Response to Official Draft Report

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OIG Recommendation 1: Establish additional controls for the consolidated tracking system to ensure required information is captured and monitored.

FS Response to Recommendation No. 1: The FS concurs with this recommendation. We have initiated a new tracking chart for accidents, called “Forest Service National Headquarters Monitoring of Serious Accident and Fatality Actions.” This will track the following: incident name and date of occurrence, type of incident, brief description, recommendations for FS action, due date for recommendations, actions taken by FS (including who is implementing recommendations) and date of completed action. The Risk Management staff in Boise will identify those incidents that require national tracking and will report those to the Fire and Aviation Management’s Planning and Budget staff. We will begin using this new system immediately.

Estimated Completion Date: September 30, 2010

OIG Recommendation 2: FS needs to ensure that its interim directive, which establishes a Professional Peer Review panel to review all incidents with evidence of misconduct or violation of safety standards or policy, is incorporated (into) its Wildland Fire Suppression Manual before the expiration date of July 13, 2011, or FS will need to extend the directive until it is incorporated.

FS Response to Recommendation 2: The FS concurs with this recommendation. The interim directive language is included in the revision of the entire chapter of the FS Manual, FSM 5100 - Fire Management, Chapter 5130 – Wildland Fire Suppression.

Estimated Completion Date: November 30, 2010

OIG Recommendation 3: Implement and provide OIG with a copy of a formal written policy in its manual or handbook that outlines how contract crew qualifications will be reviewed.

FS Response: The FS concurs with this recommendation. The FS will include the written policy in the revision of the FS Handbook, FSH 5109.17.

Estimated Completion Date: August 31, 2011