



U.S. Department of Agriculture



Office of Inspector General
Western Region

Audit Report
Forest Service
Firefighting Contract Crews
Washington, DC

Report No. 08601-42-SF
MARCH 2006



UNITED STATES DEPARTMENT OF AGRICULTURE

OFFICE OF INSPECTOR GENERAL

Washington D.C. 20250



DATE: MAR 14 2006

REPLY TO

ATTN OF: 08601-42-SF

TO: Dale Bosworth
Chief
Forest Service

ATTN: Sandy Coleman
Audit Liaison

FROM: Robert W. Young /s/
Assistant Inspector General
for Audit

SUBJECT: Forest Service Firefighting Contract Crews

This audit report presents the results of our review of Forest Service firefighting contract crews. Your written response to the draft report is included as exhibit C. Excerpts from your response and our position on the response are incorporated into the relevant sections of the report.

Based on your written response, we have accepted your management decisions on all of the recommendations. Follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer.

We appreciate the cooperation and assistance your staff provided during the audit.

Executive Summary

FS-Firefighting Contract Crews (Audit Report No. 08601-42-SF)

Results in Brief

The Office of Inspector General (OIG) audited Forest Service's (FS) use of contract firefighting crews. Our objective was to evaluate FS' direct administration of these contracts and its coordination with other parties that administer contracts for crews that fight wildfires on FS land. We found that FS needed to improve contract oversight, strengthen training and experience requirements, address control weaknesses at wildfire suppression associations,¹ improve language proficiency assessments, and coordinate with other Federal agencies to identify undocumented workers.

As wildfire activity on national forest land has become more intense, FS has made increasing use of contract suppression crews to supplement agency resources. Contract crews are mostly concentrated in the Pacific Northwest, Northern California, and the Intermountain West. Almost all such crews are provided through the Pacific Northwest Wildfire Coordinating Group's (PNWCG)² Interagency Firefighting Crew Agreement, which is administered by the Oregon Department of Forestry (ODF), and FS' National Firefighter Crew Contract.

During the 2002 fire season, incident management personnel noted numerous performance problems with poorly trained and inexperienced crews under the PNWCG/ODF agreement. The Government Accountability Office (GAO) later reported the impact of such problems on the 2002 Biscuit Fire.³ Since 2003, ODF personnel have performed pre-season reviews of contractors' qualification records. ODF significantly enhanced this process in 2004 by adding more in-depth compliance reviews throughout the year and in 2005 by monitoring pre-season work capacity fitness testing for a sample of contractors.⁴

FS initiated the National Firefighter Crew Contract in 2002. The agency appointed a contracting officer at the National Interagency Fire Center (NIFC) to provide general direction, and the regions had personnel in the field to facilitate the implementation of national crews on incidents. FS, however, lacked an administrative function to conduct pre-season reviews to verify crewmembers' qualification and training records, or to monitor work capacity testing. NIFC acquisition staff told us that they had insufficient

¹ The associations discussed in this audit are private organizations that represent wildfire suppression contractors and provide training to their employees.

² PNWCG coordinates Federal, State, and local government firefighter organizations in the States of Oregon and Washington. FS, as the largest constituent organization, has significant influence and responsibility over coordinated activities, including the Interagency Firefighting Crew Agreement.

³ "Biscuit Fire, Analysis of Fire Response Resource Availability, and Personnel Certification Standards," (GAO-04-426, April 2004)

⁴ All crewmembers must pass a pre-season work capacity test, which demonstrates their ability to satisfy physical requirements for arduous duty positions.

resources for these reviews and that they lacked the authority to direct the regions to do this work. Because of this, FS lacked assurance that national crews satisfied the standards promulgated by the National Wildfire Coordinating Group (NWCG)⁵ and that they had the training and experience needed to work safely and efficiently on fires.

Contractors certified qualifications for crewmembers who had not satisfied standards and requirements for their positions. At 10 contractors' offices, we reviewed qualification records for a judgmental sample of 107 firefighters who worked on national crews, ODF crews, or both. We found that at least 35 of these records lacked the documentation required for the individual firefighters' positions. For example, training certificates were missing, task books were not completed properly, and firefighters were advanced to supervisory positions with inadequate work experience.

In addition, FS lacks assurance that firefighters that have been trained by wildfire suppression associations have been properly trained. In 2005, PNWCG signed memorandums of understanding (memorandums) with seven wildfire suppression associations that allowed them to train private sector firefighters. The memorandums required the associations to maintain accurate records, and to train the firefighters in accordance with NWCG standards. However, since association officers and trainers may be the owners and employees of companies that provide firefighter contract crews, the associations may have a conflict of interest when performing duties that require independence.

Association instructors may be vulnerable to pressure from their companies to cut corners when they provide training, and the integrity of training and qualification records may be compromised when owners or employees of contract companies have unchecked access to association databases. For example, one association's lead instructors have sole authority to create and modify database records. FS needs to ensure that such privileges are restricted to personnel who do not have an employment or financial interest in any contractor's business.

We also determined that FS does not have adequate assurance that supervisors of non-English-speaking contract crews are able to communicate effectively with either wildfire incident management staff or their own crews. FS has not adopted a standardized field language assessment for national crews. Further, PNWCG has not developed a pre-season qualification procedure that will provide additional assurance of language proficiency.

The presence of crews that cannot communicate with incident management personnel can seriously impact safety on the fireline. In addition, if fire

⁵ NWCG is a national umbrella organization that sets standards and coordinates activities for firefighting organizations within Federal, State, and local agencies.

managers reject dispatched crews because of communication issues, suppression efforts will be adversely affected and suppression costs increased pending the arrival of replacement crews. Given these safety concerns, we issued a management alert recommending that FS adopt ODF's field language assessment procedure for the 2005 fire season.⁶ On June 30, 2005, FS agreed to take this action.

Undocumented workers are a problem on contract firefighting crews. We do not, however, have sufficient information to estimate their share of the workforce. This is one of the issues OIG investigations is looking into in their ongoing investigations. Neither the contractors nor firefighting organizations receive routine support from Federal immigration authorities in detecting falsified or counterfeit immigration and/or identification documents.

These findings confirm the need to address serious control weaknesses with respect to the firefighting contract crews. They also disclose that deficiencies identified in a prior FS review, GAO audit, and OIG investigation have not been adequately addressed. We did not identify any issues with respect to two areas in which we conducted audit work—compliance with Federal Acquisition Regulations and the accuracy of and support for payments to contractors.

Recommendations In Brief

To strengthen controls over firefighting contract crews, we recommend that FS take the following actions.

- Develop a program to review and verify national contract firefighter qualification records.
- Verify that associations' training sessions receive sufficient monitoring to ensure they are in accordance with NWCG's standards.
- Ensure that associations restrict privileges to create and modify electronic training records to individuals who do not have an employment or financial interest in any contractor's business.
- Adopt ODF's standardized field language assessment for national contract crews, and ensure that PNWCG completes the pre-season language assessment and certification procedure

⁶ ODF adopted a standardized field assessment process. The process included an English speaking and reading evaluation that incorporated fire documents, safety alerts, and manual direction to test language skills in the specific work area of wildfire suppression. It also included an evaluation sheet that guided incident management staffs' evaluation of language skill and ensured a consistent approach. NIFC has not adopted a similar process for the national contract.

- Coordinate with Federal agencies having regulatory or enforcement authority in order to identify counterfeit documents used to obtain employment on contract crews.

Agency Response In its written response to the audit report, FS concurred with all of our findings and recommendations. The complete written response is shown in Exhibit C of the audit report.

OIG Position We accept FS' management decision for all recommendations in this report.

Abbreviations Used in This Report

CRWB	Crew Boss
FFT1	Firefighter Type 1 – Advanced Firefighter/Squad Boss
FFT2	Firefighter Type 2 - Firefighter
Form I-9	Employment Eligibility Verification form
FS	Forest Service
GAO	Government Accountability Office
ICE	United States Immigration and Customs Enforcement (U.S. Department of Homeland Security)
ICT5	Incident Commander Type 5
NIFC	National Interagency Fire Center
NWCG	National Wildfire Coordinating Group
NWSA	National Wildfire Suppression Association
ODF	Oregon Department of Forestry
OIG	Office of Inspector General
PMS	Publications Management System (NWCG)
PNWCG	Pacific Northwest Wildfire Coordinating Group
SSA	Social Security Administration
WO	Forest Service’s Washington Office

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Background and Objectives

Background

Wildfire suppression crews perform basic tasks, such as clearing brush, constructing firelines, and completing mop-up after fires have been brought under control. The crews are available to fight wildfires for FS or other land management agencies.

Firefighting crews generally have 20 members. Each crewmember must satisfy the training and experience standards for at least one of the positions of firefighter (FFT2), advanced firefighter/squad boss (FFT1), or crew boss (CRWB), as prescribed by the National Wildfire Coordinating Group (NWCG)⁷ in its Wildland and Prescribed Fire Qualification System Guide (PMS 310-1). In addition, each crewmember must take an annual firefighter safety refresher course and successfully pass an annual work capacity fitness test for arduous duty.

NWCG's Fireline Handbook (PMS 410-1) provides minimum crew standards for national mobilization. These standards establish crew ratings of Type 1, Type 2-IA, Type 2, or Type 3. The ratings depend on factors such as fireline capability and production, experience levels, leadership qualifications, and training intensity. Type 1 crews are the most proficient. The best of these are the Interagency Hotshot Crews. Type 2-IA (Initial Attack) crews have some characteristics similar to Type 1 crews, including squads that can operate independently from the crew leader. Type 2 crews, which are the most common, have significantly higher capabilities than do Type 3 crews.

FS uses both agency and contract crews. Agency crews include permanent FS employees as well as seasonal and temporary hires. Almost all of the contract crews available to FS nationwide are provided through either the Pacific Northwest Wildfire Coordinating Group's (PNWCG)⁸ Interagency Firefighting Crew Agreement, which is administered by the Oregon Department of Forestry (ODF), or the National Firefighter Crew Contract, which is administered by FS from its office at the National Interagency Fire Center (NIFC) in Boise, ID. At the start of the 2004 fire season, ODF had 295 crews available and FS had 52 available under the national contract.

ODF initiated a State crew contract in 1988. By 1991, ODF crews were made available to all PNWCG members under an interagency regional agreement. The number of crews under the agreement remained under 150

⁷ NWCG is a national umbrella organization that sets standards and coordinates activities for firefighting organizations within Federal, State, and local agencies.

⁸ PNWCG is the regional coordinating group for government firefighting agencies within the States of Oregon and Washington. FS, as the largest constituent organization, has significant influence and responsibility over coordinated activities, including the Interagency Firefighting Crew Agreement.

throughout the 1990's, but increased to 250-300 after an unusually active fire season in 2000. This increase overwhelmed ODF's ability to administer the agreement, and crew performance problems became evident by the 2002 fire season when numerous incidents with contract crews were documented. For example, a deputy incident commander from the National Forests in Florida wrote a report citing problems such as inexperienced squad and crew bosses, poor English communication and comprehension, and disciplinary issues.⁹ In addition, a Government Accountability Office (GAO) report on the Biscuit Fire concluded that insufficiently trained and inexperienced contract crews negatively impacted firefighting efforts.¹⁰

ODF has since obtained additional resources and has made significant improvements to its contract administration program. For 2004, ODF signed up 90 contractors that were able to provide as many as 295 crews.

FS started the national contract in August 2002 with 12 contractors and 52 crews. Ten of these contractors also had crews listed under the 2004 ODF agreement. FS had planned for this contract to be in effect for 2002 and for 2 additional option years, with renewal in 2005; however, the agency has extended the initial contract for the 2005 fire season.

In 2005, PNWCG signed a memorandum of understanding with seven wildfire suppression associations to train private sector firefighters.¹¹ The associations contract with instructors to present courses in the NWCG curriculum. NWCG's Field Manager's Course Guide (PMS 910-1) provides standards and instructor qualifications for each course. The associations also maintain records of training courses that individual firefighters have taken and passed and issue certificates of this training to the contractors for inclusion in the employees' qualification records. ODF is responsible for administering the memorandum on behalf of PNWCG agencies.

The national contract and the ODF agreement have many similarities, especially since both adhere to NWCG's standards, but there are also key differences. The national contract assigns each crew to a host forest. These crews must remain at defined dispatch locations for specific dates each year. National crews have dispatch priority over other contract crews (but after agency crews).

Federal Acquisition Regulations recognize the ODF instrument as a basic ordering agreement. It acquires the force of a contract when crews accept a dispatch order. In this report we refer to vendors under both the national

⁹ "Feedback on PNW Contract Crews and Engine Tenders," FS Deputy Incident Commander, Southern Area Red Team (November 2002)

¹⁰ "Biscuit Fire, Analysis of Fire Response Resource Availability, and Personnel Certification Standards," (GAO-04-426, April 2004).

¹¹ The associations discussed in this audit are private organizations that represent wildfire suppression contractors and provide training to their employees.

contract and the ODF agreement as contractors. Whereas national crews have been almost exclusively rated as Type 2-IA, ODF crews are all Type 2.

Objectives

Our audit objective was to evaluate the effectiveness of FS' direct administration of private firefighter crew contracts and its coordination with other parties that administer contracts for crews that fight wildfire on FS land. To accomplish this, we:

- Assessed the adequacy of corrective actions taken for deficiencies noted in prior audits and reviews.
- Confirmed that contracts were in accordance with Federal Acquisition Regulations.
- Assessed controls over contract crews' readiness, effectiveness, proficiency, and safety.
- Ensured that contract payments were accurate and properly supported.

See the Scope and Methodology section at the end of this report for details of our audit methodology.

Findings and Recommendations

Section 1 Contract Administration

This section addresses the need for administrative oversight to confirm that contract firefighters have actually received the training and experience which their certifications indicate and that they have the physical fitness required for arduous duty. Contractors are required to maintain specific records to support each firefighter's qualifications. At the beginning of each fire season contractors must certify qualification cards for all personnel.

For Finding 1, we report that FS had no procedure to conduct a review of firefighter qualification records or to monitor crewmembers' work capacity testing.¹² Although ODF had extensive review procedures for its crews, the agency had not fully implemented them until 2005.

We reviewed 107 firefighters' qualification records at 10 contractors' offices. For Finding 2, we report that at least 35 of the 107 records did not meet standards set by NWCG, the national contract, and/or the ODF agreement—or they lacked documentation to substantiate that those requirements had been satisfied. In part, the issues identified were the result of inadequate agency reviews. In addition, FS had not ensured that contractors received specific direction with regard to experience requirements, ICT5 certification, and task book administration.

Finding 1

FS Did Not Provide Adequate Oversight of the National Firefighter Crew Contract

FS did not have controls to confirm national contract crews' qualifications and fitness for duty. FS had appointed a contracting officer at NIFC to provide general direction, and the regions had personnel in the field to facilitate the deployment of national crews on incidents. However, the agency did not assign staff to review contractors' records for documentation verifying that their contract firefighters met training and experience standards. The contracting officer had resigned his position before we had a chance to interview him concerning this issue. The contracting officer's supervisor at NIFC told us that his office had inadequate resources to perform this work and did not have the line authority to direct the regions to do so. As a result, FS lacked assurance that national crews satisfied NWCG standards and that they would have the training and experience to operate safely and efficiently while fighting wildfires.

¹² This is a pre-season test that all crewmembers must pass, which demonstrates their ability to satisfy physical requirements for an arduous duty position.

The national contract required contractors to maintain, at minimum, the following qualification records for each employee: prerequisite course training certificates, certified task books that document completion of qualifying work for firefighting positions, and evidence of successful completion of annual safety refresher training and work capacity testing. As needed, FS may review these records prior to contract award and at any time during the contract's term. As discussed above, we found no evidence that FS had conducted such reviews.

During the 2002 fire season, incident management personnel noted numerous performance problems with poorly trained and inexperienced crews under the ODF agreement. GAO later reported the impact of such problems on the 2002 Biscuit Fire.¹³ Since 2003, ODF personnel have performed pre-season reviews of contractors' qualification records. ODF significantly enhanced this process in 2004 by adding more in-depth compliance reviews throughout the year and in 2005 by monitoring pre-season work capacity fitness testing for a sample of contractors. We concluded that these measures should significantly improve quality assurance controls for ODF crews.

We prepared an issue paper and discussed this finding with WO officials and staff on July 12, 2005. Some FS personnel expressed concern that our recommendation would result in onerous review procedures without a clear benefit to justify additional costs. We agree that internal controls should be cost-beneficial and in accordance with identified risk. The results of our review of qualification records at 10 contractors' offices suggest that there are significant problems regarding the documentation of the training received and actual work experience gained by contract crew personnel. These are the same problems previously reported by FS, GAO, and OIG investigators.¹⁴

Recommendation No. 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.

¹³ "Biscuit Fire, Analysis of Fire Response Resource Availability, and Personnel Certification Standards," (GAO-04-426, April 2004)

¹⁴ "Feedback on PNW Contract Crews and Engine Tenders," FS Deputy Incident Commander, Southern Area Red Team (November 2002). "Biscuit Fire, Analysis of Fire Response Resource Availability, and Personnel Certification Standards," (GAO-04-426, April 2004). Report of Investigation SF-899-92 for the Cramer Fire (USDA-OIG, February 2004)

Agency Response.

In its written response dated March 2, 2006, FS stated that it will make no awards for the national contract without first reviewing qualification records of key personnel. FS will coordinate further actions with the PNWCG to establish a new process whereby much of the review and monitoring work will be contracted. FS and ODF will complete implementation of this process by March 31, 2007.

OIG Position.

We accept FS' management decision. For final action, please provide documentation to OCFO to indicate that the agreed upon actions have been taken.

Finding 2

Controls Over Training and Experience of Contract Crews Need to be Strengthened

Contractors certified crewmembers to hold positions for which they were not qualified. Our review of qualification records for 107 firefighters at 10 contractors disclosed that at least 35 of the records did not satisfy applicable standards¹⁵ or they lacked documentation to substantiate that those standards had been satisfied. The issues identified were partly the result of FS personnel not reviewing crewmembers' qualification records. Without this review process, FS was not aware of the training and experience deficiencies that we identified during our audit. In addition, FS had not provided contractors adequate direction with regard to NWCG experience requirements,¹⁶ ICT5 certification, and task book administration. As a result, firefighters who had not received adequate preparation to perform their jobs in a safe and proficient manner are being dispatched to fight wildfires on contract crews.

The national contract and ODF agreement both required contractors to maintain files that contained copies of training certificates, position task books,¹⁷ qualification cards, experience records, work capacity results, and

¹⁵ This includes standards of NWCG, the national contract, or the ODF agreement.

¹⁶ NWCG provides training and experience standards for various firefighting positions in PMS 310-1.

¹⁷ NWCG prescribes task books for various firefighting positions to enable trainees to document their ability to perform the specific duties (tasks) required for those positions. An individual who has demonstrated ability in his or her current position and has completed prerequisite training courses may receive a task book to work as a trainee for a higher or different position. An evaluator must initial and date the performance of each task and may recommend the trainee be certified for the position. An agency representative may then certify the individual as qualified, based on the successful completion of all training requirements and the sufficiency of his or her work experience.

performance evaluations. Both required that firefighters complete prerequisite training courses before beginning position task books to advance from firefighter (FFT2) to advanced firefighter/squad boss (FFT1), and then to crew boss (CRWB).

There was a difference between the FS national contract and the ODF agreement in the experience required for advancement to advanced firefighter and crew boss. The national contract allowed advancement based on a general standard of satisfactory performance. On the other hand, since 2003, ODF has required firefighters to have a specific amount and type of work experience at a lower position, including at least three incidents with active flame, before being eligible for the higher position.

For crews with the more exacting Type 2-IA rating, the national contract required that individual squads be able to work independently in the initial attack environment. Accordingly, the national contract required that squad and crew bosses obtain the ICT5 certification. Although the contract is silent about what experience is needed for this certification, NWCG prescribes that firefighters first must have demonstrated satisfactory performance as an advanced firefighter and then must complete a position task book, demonstrating satisfactory performance as an ICT5 trainee.

We visited the offices of 10 contractors—5 who participated in ODF’s agreement and 5 others who provided crews for both ODF and the national contract. At these offices, we reviewed qualification records for a total of 107 contract firefighters. We concluded that at least 35 firefighters (1) did not meet NWCG’s standards, (2) did not fulfill requirements for their positions as detailed in the national contract and/or the ODF agreement, or (3) lacked documentation to substantiate that those requirements had been satisfied (see Exhibit B).

Following are recurring discrepancies we found in our review, with the reasons for those discrepancies in italics. We also note when a discrepancy applied only to a national contract provision.

- Records lacked documentation of training needed for certification as an advanced firefighter, or crew boss.

Generally, certificates had been lost. In some cases, however, firefighters had not taken required courses.

- Firefighters had not completed prerequisite courses before starting position task books.

Company representatives did not consider it necessary to complete training before starting position task books.

- Contractors advanced firefighters to advanced fighter or crew boss without sufficient training experience and/or without suitable experience under prior qualifications.

Private contractors are under serious business pressure to develop squad bosses (advanced firefighters) and crew bosses, and they may be tempted to advance individuals to those positions before they are ready. Government firefighting organizations have an independent agency certification process, which can serve as a check against such premature promotions. For the contractors, however, we noted that the same individuals (often company owners) provided both evaluator and agency certifications on position task books. When the evaluators were not owners, they were employees, and, therefore, not independent. As we discuss above, before 2003 neither the national contract nor the ODF agreement provided specific experience requirements. ODF's requirements did not go into effect until that year and ODF did not impose them retroactively. For our review, we applied ODF's standard to all the advanced firefighter/squad boss and crew boss records reviewed, regardless of when the individuals had attained their positions.

- Contractors did not adhere to NWCG standards for ICT5 certification. They permitted crewmembers to certify for advanced firefighter and ICT5 concurrently and also did not require crew bosses to complete ICT5 position task books (National Crew Contract provision).

Contractors believed there was no essential difference between requirements for the advanced firefighter and ICT5 certifications. They believed crew bosses were already at a position superior to ICT5's.

We have already noted that NWCG standards require that firefighters must have been certified as advanced firefighters and have demonstrated satisfactory performance in that position before they can initiate an ICT5 task book. The ICT5, like all incident commander positions, requires the ability to exercise independent initiative and leadership that is beyond the level normally required for squad and crew bosses.

- Certifying personnel committed numerous irregularities in administering position task books—failure to certify completion of tasks, neglecting to provide final certification, and including work experience occurring before trainees had started their task books.

Contractors considered position task books to be formalities instead of essential quality control measures. FS and other government agency personnel, unlike contractors, received formal training in task book administration.

Experience requirements that ODF has adopted for advancement to advanced firefighter and crew boss provide needed control over contractors who do not have an independent agency certification process. FS needs to modify the national contract to incorporate these requirements.

Since the national contract requires the ICT5 qualification for squad and crew bosses, it should specify the minimum training and experience prerequisites for that position, as it does for the advanced firefighter and crew boss positions.

We concluded that problems with position task book administration were due to insufficient understanding of the purpose and importance of this document. FS needs to ensure that all appropriate contractor personnel receive training in this area.

Recommendation No. 2

Modify the national contract to incorporate experience requirements from the ODF agreement.

Agency Response.

In its written response dated March 2, 2006, FS agreed to include the experience requirements in the 2006 national contract solicitation by March 31, 2006.

OIG Position.

We accept FS' management decision. For final action, please provide documentation to OCFO to indicate that the agreed upon actions have been taken.

Recommendation No. 3

Specify minimum training and experience prerequisites for the ICT5 position in the national contract.

Agency Response.

In its written response dated March 2, 2006, FS stated it will include ICT5 training and experience requirements in the national contract solicitation and will brief contractors on these requirements by March 31, 2006.

OIG Position.

We accept FS' management decision. For final action, please provide documentation to OCFO to indicate that the agreed upon actions have been taken.

Recommendation No. 4

Provide position task book training which should include training documentation requirements for all contractors.

Agency Response.

In its written response dated March 2, 2006, FS said that contractors will be directed to review applicable on-line training materials. The contract will be revised to require that task book administrators complete this training and that contractors maintain documentation of such completion. Pre-season meetings with contractors will emphasize the importance of task book administration. This will be accomplished by June 1, 2006.

OIG Position.

We accept FS' management decision. For final action, please provide documentation to OCFO to indicate that the agreed upon actions have been taken.

Section 2 Wildfire Suppression Associations

Finding 3

Control Weaknesses at Associations Compromise the Integrity of Firefighters' Qualification Records

In 2005, FS signed a memorandum of understanding (memorandum) with seven wildfire suppression associations to train private sector firefighters.¹⁸ The associations contract with instructors to present courses in the NWCG curriculum. NWCG's Field Manager's Course Guide (PMS 910-1) provides standards and instructor qualifications for each course. FS, however, lacks assurance that the associations provide training in accordance with NWCG standards and that they are maintaining accurate training records. FS, as a key member of the Pacific Northwest Wildfire Coordinating Group (PNWCG), is responsible for ensuring that the memorandum with the associations incorporates necessary controls over training for contract crews. The memorandum, however, did not provide this assurance. First, ODF, acting on behalf of PNWCG, did not have personnel available to routinely monitor training courses. Second, the memorandum did not address conflicts of interest between contractors and the associations. As a result, the quality of firefighters' training and the integrity of their qualification records may have been compromised.

ODF has required associations to provide notification at least 7 days in advance of any training sessions so that ODF staff could monitor those sessions to ensure they were in accordance with NWCG's standards. ODF did not have the financial resources to conduct this monitoring on a routine basis. However, ODF officials did attend an association's training session in May 2003, based on information from industry personnel that the training provided did not meet quality standards. After attending the training session, ODF agreed that there were serious deficiencies. Specifically, the training did not follow the NWCG program requirements; there was no interpreter for attendees whose English was less than fluent; and attendees came and went at their own will without any attendance taken by the trainers. PNWCG later terminated its memorandum of understanding authorizing the association to train firefighters.

ODF staff told us that they have since acquired sufficient funding to review associations' training, and will conduct regular monitoring visits. FS needs to work through PNWCG to ensure that this oversight provides sufficient

¹⁸ The associations discussed in this audit are private organizations that represent wildfire suppression contractors and provide training for their employees.

coverage to assure the quality of instruction provided to contract crewmembers.

Fire suppression companies have established many of the associations, including the largest, the National Wildfire Suppression Association (NWSA). In such cases, association officers and trainers may be the owners and employees of companies that provide firefighter contract crews. Consequently, these associations may have a conflict of interest when performing duties that require independence.

Association instructors may be vulnerable to pressure from their companies to cut corners when they provide training, and the integrity of training and qualification records may be compromised when owners or employees of contract companies have unchecked access to association databases. For example, NWSA's lead instructors have sole authority to create and modify database records. FS needs to ensure that such privileges are restricted to personnel who do not have an employment or financial interest in any contractor's business.

FS should work with PNWCG and ODF to accomplish the following actions.

Recommendation No. 5

Verify that associations' training sessions receive sufficient monitoring to ensure they are in accordance with NWCG's standards.

Agency Response.

In its written response dated March 2, 2006, FS agreed to work with the PNWCG and ODF to monitor contractors' training sessions. The monitoring plan will be completed by September 30, 2006.

OIG Position.

We accept FS' management decision. For final action, please provide documentation to OCFO to indicate that the agreed upon actions have been taken.

Recommendation No. 6

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.

Agency Response.

In its written response dated March 2, 2006, FS agreed to ensure that the associations' agreement will be modified to address this requirement. Further, FS and ODF will establish a monitoring program to verify compliance. This will be accomplished by June 1, 2006.

OIG Position.

We accept FS' management decision. For final action, please provide documentation to OCFO to indicate that the agreed upon actions have been taken.

Section 3 Changing Workforce Issues

In recent years, major demographic changes have affected the contract firefighting crew workforce. First, the workforce is rapidly becoming one that no longer speaks English as a primary language. Both the national contract and ODF agreement require that crew supervisors be fluent in English and in the languages of individuals under their direct supervision. Clear communication is critical for firefighters' safety, especially in stressful and dangerous situations often encountered during wildfire suppression. FS needs to adopt a standardized field assessment for language proficiency and to complete work on a planned pre-season language qualification and certification procedure. Second, undocumented workers are a problem on contract firefighting crews.¹⁹ FS does not have enforcement authority over immigration laws, but it can coordinate with Federal enforcement agencies to ensure contractors are provided the support they need to verify their workers' legal status.

Finding 4

FS Needs to Address Problems Associated with English Language Proficiency on Contract Crews

FS does not have adequate assurance that supervisors of non-English-speaking contract crews will be able to communicate effectively with either wildfire incident management staff or their own crews. The national contract for firefighter crews refers to a language proficiency standard for crew supervisors, but lacks direction for implementing it in a consistent and effective manner. This can seriously impact fireline safety and result in increased suppression costs. Given the seriousness of the matter, we issued a management alert to inform FS of our finding.

Both the national contract and the ODF agreement require that crew supervisors (crew and squad bosses) be able to communicate fluently at conversational level in English as well as in the languages spoken by those they directly supervise. During the 2003 fire season, ODF personnel noted inconsistencies in how evaluations of language proficiency were conducted. In one case, a crew whose supervisors had passed the language evaluation at the point of dispatch was rejected after the supervisors were retested at the fire location.

To remedy this situation and to add another measure of control, ODF adopted a standardized field assessment process. The process included an

¹⁹ Undocumented workers are those who lack the documents required by the Government to establish their identity (e.g., driver's license) and eligibility for work (e.g., Social Security card).

English speaking and reading evaluation that incorporated fire documents, safety alerts, and manual direction to test language skills in the specific work area of wildfire suppression. It also included an evaluation sheet that guided incident management staffs' evaluation of language skill and ensured a consistent approach. NIFC has not adopted a similar process for the national contract.

During our visits to selected contractors during the audit, we observed the following:

- The owner of a company that provided crews under the ODF agreement had listed himself on the company's manifest as a crew boss. However, based on our interviews, he had a very limited ability to communicate in English.
- During our review at another contractor we learned that three individuals who were each listed as an advanced firefighter (FFT1), and therefore eligible to work as a squad boss, could not speak English. This contractor provided crews under both the national contract and the ODF agreement. Contractor staff told us that these firefighters will not work as crew supervisors until they have acquired the required proficiency.
- We interviewed a firefighter who worked for a contractor that provided national contract crews. He told us that he had acted as a squad boss who supervised Spanish-speaking firefighters. Although he did not speak Spanish, he did not consider it a problem because there was a firefighter in the squad who could translate for him. A squad boss's inability to communicate directly with the crew increases the chances of injury or death in situations that require immediate and accurate directions.

During our audit we reviewed previous reports and investigations and conducted further interviews. Based on our work we also found that:

- In its report on the 2002 Biscuit Fire, GAO observed that crew and squad bosses for contract crews were unable to communicate with Government supervisors. GAO concluded that this caused safety concerns on the fireline.²⁰
- At PNWCG's request, a deputy incident commander wrote a memo commenting on problems with contract crews during the 2002 fire

²⁰ "Biscuit Fire – Analysis of Fire Response, Resources Availability, and Personnel Certification Standards" (GAO-04-426, April 2004)

season.²¹ He observed that English comprehension on some crews was so poor that it was “going to get someone killed.”

- An OIG investigative report on the 2003 Cramer Fire observed that one of the national contract crews had 17 members, including the crew boss, who did not speak English.²²
- An FS contracting specialist who works with both the national contract and the ODF agreement said that a lack of language proficiency has been the biggest problem with crews not being accepted by fire managers.

Communication is an essential element of firefighter safety. Safety is compromised when crewmembers are not able to understand directions and orders from fire managers and supervisors. Further, sending crews home due to a lack of language skills delays fire suppression efforts and lessens the chance that a fire will be successfully controlled.

There are growing concerns about the number of workers in the wildfire crew industry with limited English comprehension. For this reason, language fluency provisions for crew supervisors in the national contract and the ODF agreement are crucial. The ODF agreement has good procedures for ensuring effective and consistent language evaluations in the field before crews are sent to the fireline. FS should adopt these procedures for contract representatives and incident management team staff who inspect national crew personnel. We issued this recommendation through a management alert to the FS Chief dated June 10, 2005. FS responded that it would implement the recommended corrective action.

The ODF contract manager said that, even with the field language assessment procedure, crews were still being rejected for language proficiency reasons. As a result, the incident management team would be without a crew until it was able to receive a replacement. To address this, the PNWCG will be developing a language proficiency assessment that will be conducted before the season starts. This assessment will lead to a language proficiency certification (English, Spanish, etc.) that will be entered on crew and squad bosses' qualification cards. The contract manager said the assessment was supposed to be ready for 2005, but the PNWCG had not received a task order in time. He added that it would be ready for the 2006 season.

²¹ “Feedback on PNW Contract Crews and Engines/Tenders,” FS Deputy Incident Commander, Southern Area Red Team (November 2002)

²² Report of Investigation File No. SF-899-92 (February 2004)

Recommendation No. 7

Adopt ODF's standardized field language assessment for national contract crews.

Agency Response.

In its written response dated March 2, 2006, FS stated that the provision has been included in the 2006 national crew contract, which will be completed by March 31, 2006.

OIG Position.

We accept FS' management decision. For final action, please provide documentation to OCFO to indicate that the agreed upon actions have been taken.

Recommendation No. 8

Ensure that 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.

Agency Response.

In its written response dated March 2, 2006, FS stated that it had planned a pilot test of programs based on English as a second language with a local community college. However, firefighting crew contractors balked at this plan because they feared the eventual cost would be too high. FS will work with ODF to determine how best to implement the recommendation by March 31, 2007.

OIG Position.

We accept FS' management decision. For final action, please provide documentation to OCFO to indicate that the agreed upon actions have been taken.

Finding 5**Coordination with Other Federal Agencies Needed to Identify Undocumented Workers**

Undocumented workers are a problem on contract firefighting crews. Because of work priorities, neither the contractors nor firefighting organizations receive routine support from Federal immigration authorities in the detection of falsified or counterfeit immigration and/or identification documents. As a result, contractors will continue to hire individuals who are ineligible to work in the United States. We do not have sufficient information to estimate the amount of undocumented workers on contract firefighting crews, although OIG investigators are looking into this issue.²³

The Immigration Reform and Control Act of 1986 required employers to verify the eligibility of each employee hired after November 1986 to work in the United States. To accomplish this, employers must use Form I-9, "Employment Eligibility Verification." The form requires the employer to verify that the worker has one document from a list of those acceptable for establishing both identity and employment eligibility (e.g., a passport). Or the form allows the employer to examine one document that establishes identity (e.g., driver's license), and another that establishes employment eligibility (e.g., Social Security card).

Employers are required to maintain I-9 records in their files for 3 years after the date an employee is hired or 1 year after the date of employment termination, whichever is later. Upon request, all Forms I-9 must be made available to an authorized official of U.S. Immigration and Customs Enforcement (ICE),²⁴ Department of Labor, and/or the Department of Justice.

The law does not require employers to be document experts, but it does hold them to a reasonableness standard. If an employer subsequently learns of irregularities with an employee's documentation, the employer should give the employee a chance to provide proper documentation. If the employee

²³ Undocumented workers are those who lack the documents required by the Government to establish their identity (e.g., driver's license) and eligibility for work (e.g., Social Security card).

²⁴ Formerly the enforcement arm of the U.S. Immigration and Naturalization Service, ICE is now part of the U.S. Department of Homeland Security.

fails to do this, the employer may—but does not have to—terminate employment.²⁵

Individuals who are not eligible to obtain work in the United States can easily obtain realistic-looking counterfeit documents. Contractors, FS, and ODF lack personnel who have been trained to identify such false documents. The Bureau of Immigration has such personnel, but, due to work priorities, it has not been able to provide consistent enforcement services for wildfire contract crews.

Following is information we found from document review at ODF:

- An ODF investigator discovered that a contractor's qualification records for his son had two different dates of birth and five different Social Security numbers. A company representative told the investigator that the numbers were false and that the owner's son had obtained a legitimate Social Security card after recently becoming a legal resident of the United States.
- A contractor notified ODF's contract manager that a firefighter had changed his name and Social Security number.²⁶ Since the new name and number were completely different from the previous name and number, we asked ODF staff about their experience with this type of change. They indicated that they occasionally get these name and Social Security number change notifications for individuals who had, in their opinion, probably used false documents before becoming legal residents of the United States. The staff said they were discouraged from following up on such cases because they did not receive any support from ICE.

From contractor interviews, we learned the following:

- A contractor who participated on both the national contract and ODF agreement admitted that his company had had problems with undocumented workers and that they had hired a retired immigration investigator to review documents in their files.
- Another contractor with crews under both contracts/agreements said they had received no support from immigration in reviewing immigration documents. The only way they had been able to identify undocumented workers was upon notification from the Social

²⁵ Occasionally an employee who initially presented false documentation to gain employment subsequently presents valid documents (e.g., a fake driver's license and Social Security card, and then real ones later). In such a case, U.S. immigration law does not require the employer to terminate the employee's services.

²⁶ The contractor needed to disclose this to the contract manager because ODF tracks all personnel changes on company manifests.

Security Administration (SSA) that the names and numbers submitted did not match their records.

- Finally, a contractor with crews under the ODF agreement said she had never had a visit from immigration authorities and that her company too relied on SSA to identify documentation discrepancies.

We do not yet know the extent to which contract crews are composed of undocumented aliens. OIG is conducting investigations on this matter. In the meantime, FS should coordinate with Government agencies having relevant regulatory or enforcement authority in order to develop effective and expedited procedures for identifying counterfeit documents used to obtain employment on contract crews. For example, FS should establish a protocol with SSA for expedited reporting on Social Security numbers, or obtain preferential services from the Bureau of Immigration.

Recommendation No. 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.

Agency Response.

In its response dated March 2, 2006, FS said it would provide contractors direction on using SSA's online reporting process. Pursuant to the Chief's letter of November 18, 2005, FS personnel are required to monitor service contracts for health, safety, and wage violations and to notify cognizant Federal agencies if such violations are witnessed or suspected. FS expects to implement these measures by March 31, 2006.

OIG Position.

We accept FS' management decision. For final action, please provide documentation to OCFO to indicate that the agreed upon actions have been taken.

Scope and Methodology

The subject of our audit was 20-person firefighting crews available to FS through contract. At the beginning of the 2004 fire year, FS had 52 crews through the National Firefighter Crew Contract; 295 crews under the Northwest Interagency Firefighting Crew Agreement, which the ODF administered for PNWCG agencies; and 4 crews under contract in the Pacific Southwest Region. We limited the audit to the national contract and ODF agreement, since they together accounted for over 98 percent of all contract crews nationwide. Our audit concentrated on fire years²⁷ 2002-2004.

We conducted fieldwork between November 2004 and May 2005 at FS' Washington Office in Washington, DC; FS Fire and Aviation Management at NIFC in Boise, ID; the Boise National Forest in Boise, ID; the FS' Pacific Northwest Regional Office in Portland, OR; ODF's Protection Contract Services Unit in Salem, OR; and at the offices of 10 wildfire crew contractors.

Our audit included an assessment key management controls in the areas of contract award, contract administration, and financial administration. Following is a description of the extent to which we assessed these controls, including sampling techniques used:

- Contract Award. We determined FS and ODF award procedures and evaluated those procedures by reviewing related records for all 12 national contractors and for a judgmental sample of 10 of 90 contractors that participated in the ODF agreement. This latter group was selected from contractors with the largest number of crews under agreement.
- Contract Administration. We determined procedures FS and ODF used to ensure maintenance of safety and performance standards in accordance with the national contract, the ODF agreement, and the National Wildfire Coordinating Group. We judgmentally selected 10 contractors, which represented a mix of larger and smaller companies. We also sought to include a number of contractors that provided crews for both the national contract and ODF agreement (5 of the 10 satisfied this requirement). We visited each contractor's office and selected a judgmental sample of about 10 employees for whom we obtained and reviewed qualification records. We concentrated on FFT1's and CRWB's, but also included a number of FFT2's. In total, we reviewed training and qualification records for 107 contract firefighters.
- Financial Administration. We determined contract and agreement direction governing payments to contract crews. To test for compliance with this direction, we selected and reviewed supporting documentation for payments made in 2004. The Boise National Forest authorized all payments to national crews. We judgmentally selected 20 payments from contractors' payment folders. All ODF payment records for FS fires were at the Ogden Incident

²⁷ Wildfires occur throughout the year in different areas of the United States. The West often experiences intense activity until late into the fall season with the arrival of cooler weather and regular rainfall. Since the end of the fiscal-year is not a natural cut-off, fire years equate to calendar years for operational purposes.

Payment Unit. We judgmentally selected 20 of the 107 payments made for 2004 and requested that Ogden staff send us supporting documentation.

We also reviewed the process to reimburse ODF for its administrative costs in accordance with an interagency agreement through PNWCG. We examined ODF's documentation supporting the amount billed FS for 2004.

Other significant procedures to address our audit objective and support audit findings included the following:

- Obtained and reviewed pertinent GAO and OIG audit reports and FS and OIG investigative reports.
- Reviewed pertinent Federal Acquisition Regulations, including parts 37 (Contracting for Services), 6 (Competition Requirements), and 16 (Basic Ordering Agreements).
- Reviewed 2002-2004 crew evaluations on file at NIFC and 2004 crew evaluations on file at ODF.
- Interviewed FS Fire and Aviation Management staff at the WO, NIFC, and the Pacific Northwest Regional Office.
- Interviewed FS acquisition personnel at the Washington Office, NIFC Fire and Aviation Support, and the Pacific Northwest Region.
- Interviewed personnel at the ODF Protection Contract Services Unit.
- Interviewed personnel at four wildfire suppression associations that provided training services for contract crews.

We conducted our audit in accordance with generally accepted government auditing standards.

Exhibit A – Locations Visited During Audit

Organization	Location
FS Fire and Aviation Management, National Interagency Fire Center	Boise, ID
Pacific Northwest Regional Office (Region 6) Fire and Aviation Management	Portland, OR
Oregon Department of Forestry, Protection Contract Services	Salem, OR
Offices of 10 Private Contractors	Various Locations in OR

Exhibit B – Deficiencies Noted in Contractors’ Records

Contractor #	Records Reviewed	Records With Exceptions	Exception Codes
1	6	2	a
2	11	1	b
3	20	0	n/a
4	10	5	c, g, i
5	10	5	h, i, j
6	10	6	h
7	10	3	f, g, h, j
8	10	5	b, c, d, e, i
9	10	2	g
10	10	6	f, g
Totals	107	35	

Exception Code Key

- a. Firefighter under age 18 used on crew.
- b. Crew manifests listed ineligible crewmember or positions for which crewmember was not qualified.
- c. Record lacked documentation for required prerequisite training course.
- d. Record lacked position task book.
- e. Initiated task book before taking required prerequisite training course.
- f. Claimed ineligible work experience that occurred before initiating position task book.
- g. Advanced to FFT1 or CRWB with insufficient experience or documentation of such experience.
- h. Did not complete ICT5 position task book.
- i. Completed ICT5 and FFT1 task books concurrently.
- j. Position task book administration irregularities.

Exhibit C – FS Response to Draft Report

Exhibit C – Page 1 of 4



United States
Department of
Agriculture

Forest
Service

Washington
Office

1400 Independence Avenue, SW
Washington, DC 20250

File Code: 1430

Date:

MAR 02 2006

Route To:

Subject: Response to the office of Inspector General (OIG) Draft Audit Report No. 08601-42-SF, FS Firefighting Contract Crews

To: Robert W. Young, Assistant Inspector General for Audit, Office of the Inspector General, USDA

Thank you for the opportunity to respond to the draft OIG audit report on the "Forest Service Firefighting Contract Crews." We would like to particularly thank the OIG audit team for their efforts spent working with our staffs to assure that the Agency uses sound contracting principles on fire incidents. The Forest Service is wholly committed to improving our contracting procedures for the Wildland Fire Management program.

The Agency's response to the current audit recommendation is enclosed. If you have any questions on the technical content, please contact Erica Kim, F&AM Audit Lead, otherwise, contact Sandy Coleman, Assistant Director, AGO/OIG Audit Liaison Staff at 703-605-4699.

A handwritten signature in black ink, appearing to read "for Jesse L. King".

JESSE L. KING

Associate Deputy Chief for Business Operations/Chief Financial Officer

Enclosure

cc: Erica Kim, Art Seggerson

United States Department of Agriculture
Forest Service (FS)

Office of Inspector General Audit Report No. 08601-42-SF
FS Firefighting Contract Crews

Response to Draft Audit / Management Decision

OIG Recommendation No. 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.

FS Response to Recommendation No. 1: The Forest Service concurs with this audit recommendation. 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 (ODF) and the Forest Service, 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.

Estimated Completion Date: March 31, 2007

OIG Recommendation No. 2: Modify the national contract to incorporate experience requirements from the ODF agreement.

FS Response to Recommendation No. 2: The Forest Service concurs with this audit recommendation. These experience requirements will be included in the 2006 national contract solicitation that is in progress.

Estimated Completion Date: March 31, 2006

OIG Recommendation No. 3: Specify minimum training and experience prerequisites for the ICT5 position in the national contract.

FS Response to Recommendation No. 3: The Forest Service concurs with this audit recommendation. The qualifications 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 a higher operations qualification can evaluate performance.

Exhibit C — FS Response to Draft Report

Exhibit C – Page 3 of 4

We will brief vendors on this process to clarify training and experience standards described in qualifications system during the pre-proposal briefing with contractors, and also at the time of award to these contractors awarded contracts.

Estimated Completion Date: March 31, 2006

OIG Recommendation No. 4: Provide position task book training which should include training documentation requirements for all contractors.

FS Response to Recommendation No. 4: The Forest Service concurs with this audit recommendation. These training materials are available on line at the National Wildfire Coordinating Group's website at: www.nwccg.gov. (For task books on firefighter positions, see <http://www.nwccg.gov/pms/taskbook/operatio/operatio.htm>; and for Incident Commander Type 5 (ICT5) task book, see <http://www.nwccg.gov/pms/taskbook/command/command.htm>) 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.

Estimated Completion Date: June 1, 2006

OIG Recommendation No. 5: Verify that associations' training sessions receive sufficient monitoring to ensure they are in accordance with NWCCG's standards.

FS Response to Recommendation No. 5: The Forest Service concurs with this audit recommendation. This work will be accomplished in conjunction with the PNWCCG, as we all share in the requirement. Various agency personnel, such as training specialists from the Forest Service and ODF, will be assigned to monitor training once a training plan is developed. The plan on how we will monitor the sessions will be completed by September 30, 2006.

Estimated Completion Date: September 30, 2006

OIG Recommendation No. 6: 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 Response to Recommendation No. 6: The Forest Service concurs with this audit recommendation. 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 the Forest Service and ODF.

Estimated Completion Date: June 1, 2006

Exhibit C – FS Response to Draft Report

Exhibit C – Page 4 of 4

OIG Recommendation No. 7: Adopt ODF’s standardized field language assessment for national contract crews.

FS Response to Recommendation No. 7: The Forest Service concurs with this audit recommendation. In response to the initial discussions for this audit, this provision has been included in the 2006 national crew contract.

Estimated Completion Date: March 31, 2006

OIG Recommendation No. 8: Ensure that 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.

FS Response to Recommendation No. 8: The Forest Service concurs with this audit recommendation. However, 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, the Forest Service 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, the Forest Service will need to work with the Oregon Department of Forestry (ODF) to determine how best to implement this recommendation. The Forest Service plans to implement this recommendation by the 2007 fire season.

Estimated Completion Date: March 31, 2007

OIG Recommendation No. 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 Response to Recommendation No. 9: The Forest Service concurs with this audit recommendation. The Forest Service will provide information to the industry on checking for compliance using the Social Security Online Employee Reporting Instructions and Information processes at: <http://www.ssa.gov/employer/ssnv.htm>. 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.

Estimated Completion Date: March 31, 2006

Informational copies of this report have been distributed to:

Office of the Chief Financial Officer	
Planning and Accountability Division	
Director	(1)
Government Accountability Office	(2)