

Chapter 02
BLM Wildland Fire and Aviation Program
Organization and Responsibilities

A. Introduction

This handbook states, references, or supplements policy for Bureau of Land Management (BLM) fire and fire aviation program management. The standards provided in this handbook are based on current Department of Interior (DOI) and Bureau policy, and are intended to provide fire program guidance and to ensure safe, consistent, efficient and effective fire and aviation operations. This document will be reviewed and updated annually.

B. Office of Fire and Aviation

The Bureau of Land Management Office of Fire and Aviation (OF&A) consists of a Director (OF&A), Deputy Director (Boise), Deputy Director (Washington), Fire Operations Group Manager, Aviation Group Manager, Planning and Resources Group Manager, Support Services Group Manager, Budget and Evaluation Chief, External Affairs Group Manager, and the International Program Manager.

C. Program Manager Responsibilities

1. Director, Office of Fire and Aviation

- a. Develops policies and standards for firefighting safety, training, and for the prevention, suppression and use of wildland fires on Bureau lands.
- b. Provides guidance to State Directors on the use of prescribed fire and fuels management to achieve hazardous fuels reduction and resource management objectives.
- c. Integrates fire and aviation management procedures into natural resource management.
- d. Establishes position competencies, standards and minimum qualifications for fire management officers, fire management specialists and leaders based on federal interagency standards recommended by the National Fire and Aviation Executive Board.
- e. Implements the interagency Fire Program Analysis (FPA) process and develops procedures and standards for the distribution of program resources.
- f. Reviews and evaluates state fire and aviation management programs.
- g. Represents the Bureau of Land Management in the coordination of overall fire and aviation management activities at NIFC and

- on intra- and interagency fire committees, groups and working teams.
- h. In conjunction with other Federal Fire Directors, establishes priorities for assignment of critical resources during wildland fire emergencies.
 - i. Initiates or participates in Boards of Review concerning actions taken on selected wildland fires.
 - j. Negotiates cooperative agreements and/or modifications of existing national level agreements to improve fire and aviation management activities on bureau lands.
 - k. Reviews funding requests for severity, hazardous fuel reduction, and emergency rehabilitation of bureau lands damaged by wildland fires; makes determinations on funding levels and recommends approval to the Director, Bureau of Land Management.
 - l. Serves as designated contact for the United States Department of the Treasury for the certification and revocation of Certifying Officers and Assistant Disbursing Officers (CO/ADO) and Designated Officials for emergency incident payments.
- 2. Fire Operations Group Manager**
- a. Serves as the principal technical expert on fire operations to the Director, OF&A and to the BLM State Fire Programs.
 - b. Provides the Director, OF&A, technical advice, operational oversight, and leadership in all aspects of fire operations.
 - c. Performs annual fire program preparedness reviews. Evaluates compliance with policies, objectives, and standards. Assesses operational readiness and provides technical assistance to solve identified problems. Performs other operations reviews as required.
 - d. Assists the Director, OF&A, in the formulation and establishment of national policies and programs pertinent to wildland fire preparedness, suppression, and shared national resources, safety, training, and equipment.
 - e. Serves as the BLM technical expert on national interagency mobilization and utilization of fire suppression resources.
 - f. Develops national plans, standards, and technical guides for BLM and interagency fire management operations.
- 3. Aviation Group Manager**
- a. Serves as principal aviation advisor to the Director, Office of Fire and Aviation, other staffs, states, and to the DOI.
 - b. Identifies and develops bureau aviation policies, methods and procedures, and standardized technical specifications for a variety of specialized firefighting and other missions for incorporation into the directives system.

- c. Coordinates aviation-related activities between the WO and states and with other wildland firefighting, regulatory, investigative, and military agencies and services.
 - d. Coordinates provision and use of aviation resources with Business Practices, and aviation user staffs at WO and state office level.
 - e. Represents the BLM at interagency meetings and in interagency committees developing government-wide aviation policies, requirements, procedures, reports, and at aviation industry meetings and conventions.
 - f. Develops and implements aviation safety programs, accident investigation procedures, and aviation safety trend analyses.
 - g. Plans and conducts reviews and evaluations of state aviation programs.
 - h. Plans and conducts technical and managerial analyses relating to identification of aviation organization and resources appropriate for agency use, cost-effectiveness of aviation firefighting and other specialized missions, aircraft acquisition requirements, equipment developmental needs, and related areas.
- 4. Planning and Resources Group Manager**
- a. Responsible for the development and implementation of the bureau wide fire planning program. Provides guidance and assistance in administering the technical and operational aspects of the bureau's fire planning program at the regional and agency levels for the accurate identification of program funding needs. Checks for accuracy in computations with instructions and policies.
 - b. Responsible for the development and coordination of the bureau's prescribed fire, fuels management, and fire prevention annual program and recommends the distribution of program funds to regions.
 - c. Tracks all fuels management fund distributions and prior year carryover funds. Develops and maintains a national database for fuels management accomplishments in Indian Trust Lands.
 - d. Analyzes hazards and risks in the wildland urban interface using fuels modification or reduction techniques, and develops recommendations for bureau-wide application. Examines and analyzes laws and regulations pertaining to prescribed fire use/fuels management in the wildland urban interface, and works with top level bureau representatives, states and rural fire districts to recommend policy which will achieve uniformity.
 - e. Serves as the BLM's primary subject matter expert for National Fire Management Analysis System (NFMAS) fire planning, Personal Computer Historical Analysis (PCHA), Geographic Information System (GIS), Global Positioning System (GPS),

Lightning Detection System (LDS), Weather Information Management System (WIMS), prescribed fire software programs and provides user training in those applications.

5. Support Services Group Manager

- a. Manage all aspects of the responsibilities and programs under the jurisdiction of NIFC for the benefit of the BLM and cooperating agencies.
- b. Directs the accomplishment of the approved operating budget, exercising appropriate control to assure program quality goals are met according to established standards.
- c. Interprets departmental and bureau policies and directives as they affect NIFC programs.
- d. Participates in the bureau-wide and interagency task force activities as a leader or member.
- e. Responsible for the NIFC Site and Facilities Management, Business Practices, Human Resources, and Information Resource Management.
- f. Is a focal point and frequent spokesperson for the bureau and the national level, assures a public awareness of bureau programs and coordinates them with key officials in affected federal agencies, states, and occasionally with foreign governments, private individuals, private organizations, vendors, suppliers, transportation groups, airlines and others.
- g. Supports the implementation of the Bureau's Automation/Modernization/Information Resource Management (IRM) initiatives as they apply to the BLM/NIFC.

6. External Affairs Group Manager

- a. Responsible for coordination of information between the Departmental Office of Wildland Fire Coordination to the BLM, BIA, USFWS, NPS, USFS, NASF and FEMA at NIFC.
- b. Responsible for coordination of the responses to: OMB, GAO, congressional, political and other external inquires between agencies and departments, establishing and maintaining cooperative relationships, resulting in quality work products.
- c. Serves as the manager of the External Affairs program for the National Interagency Fire Center.
- d. Develops recommendations pertaining to External Affairs aspects for BLM Fire and Aviation policies.
- e. Initiates External Affairs policies and procedures pertaining to Fire and Aviation for adoption at the department level in conjunction with other departments and agencies.
- f. Serves as personal and direct representative of the Director, Office of Fire and Aviation at various meetings and functions with members of congress and staff, state governors and

legislatures, officials of local, state and federal agencies, major private corporations, public and private interest groups, and foreign governments.

- g. Serves as External Affairs expert and consultant to the Director, Office of Fire and Aviation on a wide variety of issues and policies of controversial nature, providing analysis and advice on public reaction to major policy and program issues.
- 7. Equal Employment Opportunity Manager (EEO)**
- a. Manages the Equal Employment Opportunity (EEO) program in accordance with legal, regulatory, and policy requirements.
 - b. Manages and directs the Counseling Program, and Alternative Dispute Resolution (ADR) Programs, in accordance with Equal Employment Opportunity Commission (EEOC) regulations and BLM policy for the BLM as well as other NIFC agencies.
 - c. Advises managers and aggrieved persons of employee rights and responsibilities, and procedural options and timeframes in conflict situations, formulates proposed resolutions, negotiates with managers, aggrieved persons and their representatives to informally resolve EEO matters, and executes final settlement agreements.
 - d. Manages the Affirmative Employment Program (AEP).
 - e. Develops and maintains the accessibility program for the disabled, required under Section 504 of the Rehabilitation Act of 1973, as amended, and the Americans with Disability Act (ADA of 1990).
 - f. Conducts analyses into progress in meeting equal employment opportunity program goals and administers training activities for the organization.
 - g. Provides managers and supervisors with guidance and advice on issues related to EEO/civil rights program activities.
 - h. Represents the organization in meetings with public and private groups, universities, minority and women's organizations, other Interior Department components, and other federal agencies.
- 8. International Program Coordinator**
- a. Defines the mission, goals, and objectives of the BLM Office of Fire and Aviation International Program (IP).
 - b. Develops and updates written guidelines for Internal Affairs and manages the program on a day-to-day basis.
 - c. Is the primary liaison between BLM and departmental level offices (Policy, Management and Budget, External and Intergovernmental Affairs, and the Solicitor's Office) on Fire and Aviation's IP activities.
 - d. Initiates, plans and coordinates the preparation of letters of invitation, necessary visas and clearances, prepares agendas and

- presents briefings to high level international visitors brought to the United States through the IP.
- e. Collaborates in the formulation of interagency fire management and fire suppression program activities in order to identify and promote domestic “best practices” for potential use in the international fire management environment.
 - f. Advises the Director and other senior managers within the Office of Fire and Aviation on issues related to BLM involvement in all-risk disasters such as wildfire, other natural disasters, and terrorism.
 - g. Identifies qualified BLM employees for international disaster assistance support and international assignments.
 - h. Coordinates the interagency relationship with the Forest Service’s Disaster Assistance Support Program (DASP) and The U.S. Agency for International Development’s Office of Foreign Disaster Assistance (OFDA) and manages the MOU between DASP and BLM.
 - i. Provides leadership in developing disaster management coordination mechanism, procedures, methodologies, and written guidelines for use during international disaster response activities with DASP, OFDA, the Department of Defense, UN relief organizations, and humanitarian relief organizations.
 - j. Performs as both the National Military Logistics Coordinator and the International Logistics Coordinator during National Preparedness Levels 4 and 5.

9. State Director

The State Director is responsible to the Director of BLM for fire management programs and activities within their state. The State Director will meet the required elements outlined in the Management Performance Requirements for Fire Operations and ensure training is completed to support delegations to line managers and principal actings.

10. District/Field Office Manager

The District/Field Office manager is responsible to the State Director for the safe and efficient implementation of fire management activities within their unit, including cooperative activities with other agencies or landowners in accordance with delegations of authorities. The District/Field Office manager or their principal acting will meet the required elements outlined in the Management Performance Requirements for Fire Operations.

Management Performance Requirements for Fire Operations

PERFORMANCE REQUIRED	Directorate	State Director /Associate	District /Resource Area Manager	Field Office Manager
1. Take necessary and prudent actions to ensure firefighter and public safety.	T	T	T	T
2. Ensure sufficient qualified fire and non-fire personnel are available to support fire operations at the local and national level.	T	T	T	T
3. Ensure Fire Management Officers (FMOs) are fully qualified.	T	T	T	T
4. Provide a written Delegation of Authority to FMOs that gives them an adequate level of operational authority. Include Multi-Agency Coordinating (MAC) Group authority, as appropriate.	T	T	T	T
5. Maintain a current Fire Management Plan (FMP) that identifies accurate and defensible Normal Year Readiness funding.		T	T	T
6. Develop fire prevention, suppression, and use standards that are compliant with agency fire policies.		T	T	T
7. Ensure use of fire funds is in compliance with department and agency policies.	T	T	T	T

PERFORMANCE REQUIRED	Directorate	State Director /Associate	District /Resource Area Manager	Field Office Manager
8. Annually convene and participate in pre-and post season fire meetings. Convene management teams to review fire and aviation policies and practices. Specifically address management controls and critical safety issues.	T	T	T	T
9. Annually review critical operations, safety policies and, procedures with field fire and fire aviation personnel.			T	T
10. Ensure timely follow-up to fire program reviews, preparedness reviews, safety reviews, after action reviews, and post-season reviews.	T	T	T	T
11. Ensure fire and fire aviation preparedness reviews are conducted annually in all unit offices. Personally participate in at least one review annually.		T	T	
12. Meet annually with major cooperators to review, verify the effectiveness of and update interagency agreements. Ensure that agreements are compliant with agency policies. (may be delegated by State Level).		T	T	T
13. Ensure that a Wildland Fire Situation Analysis (WFSA) is completed, approved, and kept current on all fires that escape initial attack.			T	T

PERFORMANCE REQUIRED	Directorate	State Director /Associate	District /Resource Area Manager	Field Office Manager
14. Ensure reviews are conducted on all fires that require a WFSA. Personally attend reviews on Type 1 and Type 2 fires. (may be delegated by State Office).		T	T	T
15. Ensure that a Wildland Fire Implementation Plan (WFIP) is completed, implemented and kept current for all fires managed for resource benefits.			T	T
16. Personally visit at least one wildland and one prescribed fire each year.		T	T	T
17. Provide incident management objectives, written delegations of authority, and agency administrator briefings to incident management teams.			T	T
18. Monitor the local and national fire situation and provide management oversight during periods of critical fire activity.	T	T	T	T
19. Provide resource advisor support to the wildland fire management program.			T	T
20. Attend the <i>Fire Management Leadership Course</i> .		T	T	T
21. Ensure that investigations are conducted for incidents, entrapments, and serious accidents as per agency policy.	T	T	T	T

PERFORMANCE REQUIRED	Directorate	State Director /Associate	District /Resource Area Manager	Field Office Manager
22. Annually update and review the <i>Agency Administrator's Guide to Critical Incident Management</i> (NFES1356)	T	T	T	T
23. For all unplanned human-caused fires where liability can be determined, ensure trespass actions are initiated to recover cost of suppression activities, land rehabilitation, and damages to the resource and improvements.		T	T	T
24. Ensure compliance with National and State Office policy for prescribed fire activities. Provide periodic reviews of the prescribed fire program.	T	T	T	T
25. Approve Prescribed Fire Plans which meet all agency policies are in place for each project.		T	T	T
26. Ensure that the Prescribed Fire Plan has been reviewed and recommended by a qualified technical reviewer who was not involved in the plan preparation.		T	T	T
27. Complete the go/no-go checklist for prescribed fires. Ensure the approved burn plans are followed. Provide follow-up monitoring and documentation to ensure that management objectives are met.		T	T	T

D. State Office

The State Fire Management Officer (SFMO) provides leadership for their agency fire and fire aviation management program. The SFMO is responsible and accountable for providing planning, coordination, training, technical guidance, and oversight to the state fire management programs. The SFMO also represents the State Director on interagency geographic coordination groups and Multi-Agency Coordination (MAC) Groups. The SFMO provides feedback to Districts/Field Offices on performance requirements.

E. District/Field Office

The District/Field Office Fire Management Officer (FMO) is responsible and accountable for providing leadership for fire and fire aviation management programs at the local level. The FMO determines program requirements to implement land use decisions through the Fire Management Plan (FMP) to meet land management objectives. The FMO negotiates interagency agreements and represents the District/Field Office Manager on local interagency fire and fire aviation groups.

1. Manager's Oversight

Agency administrators are required to personally visit an appropriate number of fires each year. A checklist that can be used by managers during those visits is included on page 02-20.

a. After Action Review

The "Managers Supplement for After Action Review" can be found on page 02-22. It emphasizes the factors that are critical for ensuring safe and efficient wildland fire suppression, and provides examples for managers to use in their review of incident operations and incident commanders.

F. Requirements for Fire Management Positions

Fire and Fire Aviation Management Programs will provide our customers with quality service. It is imperative that our employees meet recognized competencies and qualification criteria.

The following lists show the minimum operational experience required for fire management positions. The *Interagency Fire Program Management Qualifications Standards* may be used as general guidelines in conjunction with specific agency requirements, when filling vacant fire program positions, and as an aid in developing Individual Development Plans (IDPs) for employees.

1. Notes and Exceptions

“Equivalent” experience in positions in the Alaska Fire Service (AFS), NIFC, or other federal, state, and local agencies will be given full credit, if they are comparable to those listed or it is determined that the candidate meets the competencies for the position.

Other “equivalent” experience will be considered on a case-by-case basis. An example of this would be a unit manager or operations chief that meets the requirements for state/regional fire positions, if they have the minimum fireline experience listed below.

Extended details can be considered, if they were equivalent to a season of experience.

G. Field/Area Office**1. Assistant FMO/Fire Operations Specialist**

This position is considered moderate to high complexity in the *Fire Program Management Qualifications Standards* under the *Wildland Fire Operations Specialist Qualifications Standards*.

- a. ICT3
- b. Working knowledge of dispatch operations
- c. Working knowledge of fire aviation operations
- d. Working knowledge of fire equipment
- e. Working knowledge or demonstrated abilities in fire danger rating system

2. FMO

All of the operational experience required for the above positions, except currency, plus:

- a. A minimum of one season experience in the position of Fire Control Officer (FCO) or Assistant FMO or Prescribed Fire Specialist or Lead Dispatcher/Center Manager
- b. Division Supervisor or Unit Leader
- c. Working knowledge of fuels treatment policies, strategies, and techniques

3. Prescribed Fire and Fuels Specialist

- a. Strike Team Leader/Task Force Leader or ICT4
- b. Working knowledge of smoke management techniques
- c. Working knowledge of fire effects (RX-340)
- d. Working knowledge of the NEPA process
- e. RXB2

H. State and National Office**1. National and State Office Prescribed Fire and Fuels Management Specialist**

- a. Strike Team Leader/Task Force Leader or ICT4
- b. Advanced knowledge of smoke management techniques (RX-450 level)
- c. Advanced Wildland Fire Behavior Calculations (RX-490)
- d. Advanced knowledge of fire effects (RX-540 level)
- e. Working knowledge of the NEPA process
- f. RXB2

2. Assistant State FMO or State Fire Operations Officer

- a. FMO or Geographic Area Coordinator
- b. Division Supervisor or Unit Leader
- c. Working knowledge of the coordination system and fire aviation operations
- d. Working knowledge of NFDRS and long-range fire behavior predictive systems

3. State Fire Management Officer

State FMO or state or national fire and aviation staff. The qualifications for this position are identified in the *Fire Program Management Qualifications Standards*.

4. BLM National Fire Program Lead

The qualifications for this position are identified in the *Fire Program Management Qualifications Standards*.

5. Training for Designated Agency

The following training is required for designated agency administrators.

- a. National Fire Management Leadership
- b. Local Fire Management Leadership

The national course is the preferred alternative. The training should be completed within two years of appointment to a designated management position.

Experience requirements for positions in AFS, O&C Districts, NIFC, national office, and other fire management positions in units and state / regional offices will be established as vacancies occur, but will be commensurate with the position's scope of responsibilities. The developmental training to fully achieve competencies should be addressed in an IDP within a defined time period.

Fire Management Staff Performance Requirements for Fire Operations

PERFORMANCE REQUIRED	State FMO	Resource Area / District FMO	Field Office FMO
1. Establish and manage a safe and, effective, and efficient fire program.	T	T	T
2. Maintain and communicate safety as a core value for all aspects of fire and fire aviation management.	T	T	T
3. Ensure completion of a job hazard analysis (JHA) for fire and fire aviation activities so mitigation measures are taken to reduce risk.		T	T
4. Ensure work/rest guidelines during all fire and fire aviation activities.	T	T	T
5. Ensure that only trained and qualified personnel are assigned to fire and fire aviation duties.	T	T	T
6. Develop, implement, evaluate, and document fire and fire aviation training to meet current and anticipated needs.	T	T	T
7. Establish an effective process to gather, evaluate, and communicate information to managers, supervisors, and employees. Ensure clear and concise communications are maintained at all levels.	T	T	T
8. Develop and maintain open line of communication with public and cooperators.	T	T	T
9. Ensure that the fire and fire aviation management employees understand their role, responsibilities, authority, and accountability.	T	T	T
10. Organize, train, equip, and direct a qualified work force. Provide Individual Development Plans for incumbents who do not meet new standards. Establish and implement qualification and performance review process.	T	T	T
11. Take appropriate action when performance is exceptional or deficient.	T	T	T
12. Ensure fire and fire aviation policies are understood, followed, and coordinated with other agencies as appropriate.	T	T	T

PERFORMANCE REQUIRED	State FMO	Resource Area / District FMO	Field Office FMO
13. Monitor fire activity to recognize when complexity levels exceed program capabilities. Increase managerial and operational resources to meet the need.	T	T	T
14. Initiate, conduct, and/or participate in fire management related reviews and investigations as directed by agency policy.	T	T	T
15. Personally participate in periodic site visits to individual incidents and projects.	T	T	T
16. Utilize the Incident Complexity Analysis to ensure the proper level of management is assigned to all incidents.		T	T
17. Review and evaluate fire program performance and take corrective action as appropriate.	T	T	T
18. Ensure that incoming personnel and crews are briefed prior to fire and fire aviation assignments.	T	T	T
19. Ensure a Wildland Fire Situation Analysis (WFSA) is completed and kept current for all fires that escape initial attack.		T	T
20. Monitor fire season severity predictions, fire behavior, and fire activity levels. Take action to ensure safe, efficient, and effective operations.	T	T	T
21. Ensure that adequate resources are available to conduct fire management operations.	T	T	T
22. Provide fire personnel with adequate guidance, training, and decision-making authority to ensure timely decisions.		T	T
23. Ensure that written and approved burn plans exist for all prescribed fire projects.		T	T
24. Ensure that effective transfer of command occurs on incidents.	T	T	T
25. Develop and maintain agreements, annual operating plans, and contracts on an interagency basis to increase effectiveness and efficiency.	T	T	T
26. Provide the expertise and skills to fully integrate fire and fire aviation management into interdisciplinary planning efforts.	T	T	T

PERFORMANCE REQUIRED	State FMO	Resource Area / District FMO	Field Office FMO
27. Work with cooperators to identify and implement processes and procedures for providing fire safe communities within the wildland urban interface.	T	T	T
28. Develop and maintain a viable FMP. Annually evaluate the FMP to ensure accuracy and validity.		T	T
29. Ensure that budget requests and allocations reflect Normal Year Readiness in the FMP.	T	T	T
30. Develop, maintain and implement clear, effective, and current operational plans. (e.g., dispatch, pre-attack, prevention).	T	T	T
31. Ensure that reports and records are properly completed and maintained.	T	T	T
32. Ensure fiscal responsibility and accountability in planning and expenditures.	T	T	T
33. Identify and implement program actions to reduce unwanted wildland fire ignitions and to mitigate risks to life, property, and resources.		T	T
34. Complete trespass actions when unplanned human-caused fires occur.		T	T
35. Ensure compliance with National and State Office policy and direction for prescribed fire activities and ensure that periodic reviews and inspections of the prescribed fire program are completed.	T	T	T

I. Delegation of Authority

1. Delegation for State Fire Management Officers

In order to effectively perform their duties, a SFMO must have certain authorities delegated from the State Director. This delegation is normally placed in the state office supplement to agency manuals. This delegation of authority should include the following roles and responsibilities:

- a. Serve as the State Director's authorized representative on geographic area coordination groups, including MAC groups.
- b. Coordinate and establish priorities on uncommitted fire suppression resources during periods of shortages.
- c. Coordinate logistics and suppression operations statewide.

- d. Relocate agency pre-suppression/suppression resources within the state/region based on relative fire potential/activity.
- e. Correct unsafe fire suppression activities.
- f. Direct accelerated, aggressive initial attack when appropriate.
- g. Enter into agreements to provide for the management, fiscal, and operational functions of combined agency operated facilities.
- h. Suspend prescribed fire activities when warranted.
- i. Give authorization to hire Emergency Firefighters in accordance with the DOI Pay Plan for Emergency Workers.
- j. Approve emergency fire severity funding expenditures not to exceed the agency's annual authority.
- k. A sample "Delegation of Authority" can be found on page 02-23.

J. Employee Responsibility

All employees, cooperators, contractors, and volunteers who participate in wildland fire operations have the duty to treat one another with respect and to maintain a work environment free of misconduct and harassment. Misconduct includes but is not limited to: alcohol misuse, driving while intoxicated, the use of illegal drugs, hazing, insubordination, disregard for policies and procedures and the destruction or theft of government property.

Harassment is coercive or repeated, unsolicited and unwelcome verbal comments, gestures or physical contacts and includes retaliation for confronting or reporting harassment.

Harassment and misconduct will not be tolerated under any circumstances and will be dealt with in the strictest of terms. We must all take responsibility for creating and ensuring a healthy and safe work environment. Employees who experience or witness harassment, misconduct or any inappropriate activity should report it to the proper authority immediately.

1. Harassment

a. Physical conduct

Unwelcome touching, standing too close, looking up and down, inappropriate or threatening staring or glaring, obscene, threatening, or offensive gestures.

b. Verbal or written misconduct

Inappropriate references to body parts; derogatory or demeaning comments, jokes, or personal questions; sexual innuendoes; offensive remarks about race, gender, religion, age ethnicity, or

sexual orientation: obscene letters or telephone calls, catcalls, whistles or sexually suggestive sounds.

c. **Visual or symbolic misconduct**

Display of nude pictures, scantily-clad, or offensively-clad people; display of offensive, threatening, demeaning, or derogatory symbols, drawings, cartoons, or other graphics; offensive clothing or beverage containers, bumper stickers, or other articles.

2. **Hazing**

Hazing is considered a form of harassment. "Hazing" is defined as *any action taken, or situation created intentionally, to produce mental or physical discomfort, embarrassment, or ridicule.*

3. **Alcohol**

The use of alcohol during any work period is strictly prohibited. The performance of job duties while under the influence of alcohol is prohibited.