



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

December 18, 2018

OWF POLICY MEMORANDUM 2019 - 006

To: Director, Bureau of Land Management
Director, National Park Service
Director, U.S. Fish and Wildlife Service
Director, Bureau of Indian Affairs
Commissioner, Bureau of Reclamation
Director, U.S. Geological Survey

From: Jeff Rupert, Director - Office of Wildland Fire

Subject: Funding of Base Salaries for Personnel Assigned to Wildfire Incidents

Background

The purpose of this memorandum is to formalize policy direction for charging base-eight funding for all Department of the Interior (DOI) employees that are assigned to wildfire incidents. This policy aligns with the pay provisions outlined in Chapter 10 of the National Wildfire Coordinating Group Standards for Interagency Incident Business Management.

Ensuring the appropriate funding protocols for all DOI Wildland Fire Management (WFM) program funded employees is key to upholding the financial integrity of the WFM program. To that end, preserving the use of Suppression Activity funding for intended emergency operation needs will help maximize DOI's performance and accountability in order to meet WFM program goals. It also prevents the potential need to borrow funds from other DOI or bureau accounts to pay for suppression operations during extended or challenging wildfire seasons.

Policy

Beginning April 1, 2019, all DOI employees whose base-eight time is funded by the WFM Preparedness Activity should charge their base-eight time to Preparedness while assigned to a wildfire incident. Any work time that is incurred above those employees' base-eight hours, including overtime pay, hazardous duty pay, or any other applicable pay category while those employees are assigned to a wildfire incident, should be charged to Suppression. All other WFM-funded employees whose base-eight time is funded by another WFM activity – including Fuels Management, Facilities, Burned Area Rehabilitation, and the Joint Fire Science Program – should charge their base-eight time, and all other time that is incurred above their base-eight, to Suppression while they are assigned to an incident.

Bureaus are encouraged to pre-identify base-eight funding for WFM program split-funded employees based on their projected annual workload. To the extent practical, employees that are split-funded by Preparedness and another WFM activity (including Fuels Management) should use Preparedness to fund their base-eight time while assigned to a wildfire incident. This avoids arbitrary shifts of base-eight charges to Suppression to benefit or preserve other WFM activity funding.

Consistent with current practices, all DOI employees who are not funded by a WFM program activity or subactivity may charge their base-eight time and all other time that is incurred above their base-eight to Suppression while they are assigned to an incident. Seasonal and career-seasonal employees who have been extended beyond their normal tours of duty due to fire seasons starting earlier than normal or lasting longer than expected may charge their base-eight time and all other time that is incurred above their base-eight to Suppression during their periods of extension while they're assigned to a wildfire incident. This applies to all seasonal and career-seasonal employees, including those employees who normally charge their base-eight time to a WFM program. When not assigned to a wildfire incident, seasonal and career-seasonal employees should charge their time to the benefiting activity or subactivity.

Those employees that are backfilling positions in support of others who are assigned to a wildfire incident should charge their base-eight time to the benefiting activity or subactivity. Those employees may only charge their time to Suppression if their work is directly benefitting a wildfire incident. In such cases, the policy outlined above should be followed.

This policy also applies to sums received for fire protection rendered pursuant to 42 U.S.C. 1856 et seq., Protection of United States Property¹. The Preparedness and Suppression activities are reimbursed for Preparedness and Suppression services performed on state or private lands.

FEMA Mission Assignments

Consistent with FEMA regulations, FEMA does not reimburse Federal agencies for base-eight time for those employees assigned to a FEMA-declared disaster or emergency area. However, FEMA does pay for overtime and other payroll costs that are incurred above an employee's base-eight. Accordingly, any DOI employee whose base-eight time is funded by a WFM program activity or subactivity should continue to charge their base-eight time to that activity or subactivity while assigned to a FEMA-declared disaster or emergency area. Career seasonal or temporary employees in non-pay status may be eligible for base-eight reimbursement depending on the Mission Assignment. Any work time that is incurred above an employee's base-eight hours should be charged to the respective disaster or emergency incident.

If you have any questions regarding this policy, please contact Thao Tran at (202) 606-0518, or Thao_Tran@ios.doi.gov, or Craig Leff at (202) 606-3053, or craig_leff@ios.doi.gov.

¹ As authorized in the Department of the Interior and Related Agencies Appropriations Act, 1999: 112 STAT. 2681–232, PUBLIC LAW 105–277.