



United States Department of the Interior

OFFICE OF THE SECRETARY

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OWF POLICY MEMORANDUM 2016-014

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

From: Bryan Rice, Director Office of Wildland Fire

Subject Department of the Interior Wildland Firefighter Medical Standards Program

Purpose: The purpose of this Policy Memorandum is to ensure that the Department of the Interior (DOI) arduous duty wildland firefighters meet the Federal Interagency Wildland Firefighter Medical Qualification Standards in order to safely and efficiently perform the essential functions of a wildland firefighter, without undue risk to themselves or others.

Background: The Bureau of Land Management, U.S. Fish and Wildlife Service, Bureau of Indian Affairs, and National Park Service, collectively as the "partnering bureaus," established the Medical Standards Program in 1999. The partnering bureaus each have wildland fire management mandates and individual bureau missions, but all share that firefighter and public safety is always the first priority. In the execution of these duties, the partnering bureaus share the common responsibilities of establishing and implementing medical standards (under the authority of 5 CFR 339, Medical Qualification Determinations). The partnering bureaus agreed that their bureau's mission would be more effectively and efficiently accomplished if resources and expertise in the Department of the Interior Wildland Firefighter Medical Standards Program (DOI MSP) are shared, efforts are coordinated, and costs are shared.

The U.S. Department of Agriculture Forest Service (Forest Service) joined the DOI partnering bureaus in 2004, creating the Federal Interagency Wildland Firefighter Medical Qualification Standards Program (IMSP).

The IMSP implemented and maintained a state of the art interagency occupational health medical standards program for Federal wildland firefighter positions considered arduous and hazardous in compliance with current Federal regulations (Rehab Act of 1973, Equal Employment Opportunity Commission regulations, and Office of Personnel Management (OPM), 5CFR339 Medical Qualification Determinations) and advances in occupational medicine.

In 2009, the Forest Service chose to separate from the IMSP and to move forward with developing a Forest Service implementation program. The Forest Service continues to be a partner with DOI in the Federal Wildland Firefighter Interagency Medical Standards Team (IMST) to develop and maintain consistent policies and procedures that form the foundation of the respective medical standards programs.

Scope: This Policy Memorandum applies to all employees (incumbents and applicants) regardless of employment status and hiring authority, including emergency firefighters (Administratively Determined — AD / casual hires) and collateral duty firefighters] who participate in arduous duty wildland fire activities from all bureaus and offices within the Department.

Time Frame: This Policy Memorandum is effective immediately and remains in effect until rescinded or superseded.

Policy:

A. **Federal Interagency Wildland Firefighter Medical Standards:** The medical standards establish the minimum level of medical qualification to perform the essential functions of an arduous duty wildland firefighter. All employees (incumbents and applicants) must take an examination meeting Federal Interagency Wildland Fire Medical Standards every three years regardless of employment status and hiring authority, including emergency firefighters (Administratively Determined — AD / casual hires) and collateral duty firefighters who participate in arduous duty wildland fire activities. An examination taken and successfully cleared in accordance with the DOI MSP direction is required prior to participating in the Arduous Duty Work Capacity Test (Pack Test), performing arduous duty, wildland fire duties, or any agency sanctioned physical fitness training to prepare for these duties. In the years between the periodic examinations, an employee will self-certify their medical concerns and risk in taking the Work Capacity Test.

¹*Collateral duty firefighters* - agency/bureau personnel who become qualified to hold firefighter positions based on extra training and experience gained alongside their primary job occupations (e.g., biologist, engineer, range technician), where wildland firefighting is a collateral, rather than primary duty of their position. The maximum percentage of time that should be spent on these collateral firefighter duties is 20%. If the position performs 25% or more, the duties are not collateral and must be clearly referenced as a major duty in a separate PD.

B. **Medical Examination:** The DOI MSP will provide medical examinations to assess medical qualifications to the standards for performing arduous duty wildland fire activities consistent with the requirements and guidance provided in 485 DM 18. Medical examination findings may be used for medical surveillance purposes over a number of years.

C. **Risk Mitigation/Waiver:** The Wildland Firefighter Medical Profile Risk Mitigation/Waiver (RM/W) process allows an individual, with mitigation(s), to perform the essential functions of an arduous duty wildland firefighter without endangering the health and safety of the individual or others. The unit Agency Administrator/Line Officer, or delegate, is referred to as the Management Official (MO) within the DOI MSP, and is responsible for and has the authority to make the RM/W decision.

All Employees (incumbents and applicants) receiving a not qualified determination following a medical examination will have an opportunity to participate in the RM/W process, as outlined in DOI MSP implementation standards. An applicant (including casuals) being considered for a position performing arduous duty wildland fire activities may go through the RM/W process with the understanding that the applicant cannot be offered the position until the RM/W determination is accepted by the unit Management Official.

The Servicing Human Resource Officer (SHRO) and Fire Management Officer (FMO) in coordination with the Wildland Fire Safety Program Manager (WFSPM) shall provide the Management Official with the RM/W documentation (including recommendations) and be available for consultation for RM/W determination decisions. The Management Official will reevaluate RM/W decision prior to appointment for a different position where new duties affect the integrity or effectiveness of the RM/W in place. The MSP Reviewing Medical Officer will reevaluate non-qualifying health conditions of the RM/W when 1) the individual takes a subsequent medical examination for arduous duty wildland fire, or 2) has a change in their continued capacity to meet the physical or medical requirements of the position.

D. **Fitness for Duty Examination:** A Supervisor may require an employee who occupies a position or has a current Incident Qualification, which has medical standards or physical requirements for performing the essential functions of an arduous duty wildland firefighter to undergo a fitness-for-duty medical examination. The fitness-for-duty examination may be required whenever there is a reasonable concern, based on objective evidence, about the employee's continued capacity to meet any of the physical or medical requirements of the position. Such an examination may be ordered for instances of job-related injuries/illnesses and for those that are not job-related.

Supervisors should contact their SHRO and WFSPM for assistance in preparing the memorandum for a Fitness-for-Duty examination. The DOI MSP Program management will review the memorandum before issuance to an employee.

E. **Program Costs:** The DOI MSP operating costs will be jointly funded as a Department-wide preparedness activity.

The employee's general program activity account code should fund medical examination charges. Exceptions include jointly funded and collateral duty firefighters. Only AD / casual hire medical examination costs may be funded from the suppression activity account. The participation of medical service providers will be made as part of a multi-agency national contract or agreement to minimize costs and make the overall program more efficient. Co-located DOI programs and other Federal agencies needing medical services may be coordinated and costs shared with the DOI MSP.

F. **Program Guidance:** The DOI MSP, under the governance and oversight of the DOI members of the Fire Management Board, will provide the implementation standards, requirements and procedures, current information, job aids, and process direction. The DOI MSP website will host applicable information and is located at <https://www.nifc.gov/medicalstandards/>.

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