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COVID-19: FS' Wildland Fire Response Plans



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TO: Vicki Christiansen
Chief
Forest Service

ATTN: Antoine Dixon
Chief Financial Officer
Forest Service

FROM: Gil H. Harden
Assistant Inspector General for Audit

SUBJECT: COVID-19: FS' Wildland Fire Response Plans

The purpose of this memorandum is to provide the Office of Inspector General's (OIG) comments on the Wildland Fire Response Plans (WFRP) that were developed in order to more safely and effectively combat wildland fires during the coronavirus (COVID-19) pandemic.¹ The WFRPs were developed under the direction of the National Multi-Agency Coordinating Group, which includes the Forest Service (FS), as well as other Federal, State, and local wildland fire agencies. The impacts of the COVID-19 pandemic will likely cause wildland firefighting challenges across the wildland fire community, potentially causing the 2020 wildfire season to be one of the most dangerous in years.

We recognize that the WFRPs are subject to change based on the experiences and best practices that are shared within the firefighting community as the fire season continues in light of the COVID-19 pandemic. We also recognize that the plans were not intended to be overly prescriptive and that no one wildland fire agency, including FS, can dictate changes to the WFRPs. However, we identified certain processes and procedures that, if uniformly followed throughout all of the geographic areas, could enhance not only FS' ability to more safely and effectively combat wildland fires during the COVID-19 pandemic, but also other Federal, State, and local wildland fire agencies utilizing the WFRPs.

¹ This memorandum was not intended as an audit or inspection product and was not developed in accordance with generally accepted government auditing and inspections standards. Due to the pending wildfire season, we felt the message required a quick response and, therefore, this message contains suggestions based on analysis of publicly available information.

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) provided more than \$70 million in funding to FS to assist with relief efforts for various programs identified within the agency.² Included in the funding was \$7 million for Wildland Fire Management to prevent, prepare for, and respond to COVID-19, including for personal protective equipment and baseline health testing for first responders. The CARES Act also included funding for OIG to provide oversight of agencies and specific programs that received funding under the CARES Act.

As part of our oversight of FS' CARES Act activities, we reviewed the WFRPs for the following 10 geographic areas: (1) Northwest; (2) Northern California; (3) Southern California; (4) Alaska; (5) Great Basin; (6) Northern Rockies; (7) Rocky Mountains; (8) Southwest; (9) Southern; and (10) Eastern. The reviewed WFRPs were completed in May 2020 and are currently accessible to the public on the following website: <https://www.nifc.gov/fireInfo/covid-19.htm>.

In reviewing these plans, OIG also considered guidance issued by various health organizations, including the Centers for Disease Control and Prevention (CDC), the Occupational Safety and Health Administration, and the World Health Organization.³ Additionally, while frameworks for reopening facilities may not have a direct correlation because of the nature of fire operations and first responders, we also considered publicly available information from both the USDA Reopening Playbook and the USDA COVID-19 Playbook to determine if fundamentals prescribed in the guidance would enhance the protocols for wildfire response during the COVID-19 pandemic.^{4, 5}

The following are our observations and/or suggestions regarding the WFRPs we reviewed:

1. None of the WFRPs required personnel assigned to a fire to be tested for COVID-19. The WFRPs did mention acquiring testing kits when available; however, the plans did not provide any detail on how FS planned on acquiring and implementing the tests. To help ensure the health and safety of all personnel assigned to a fire and to reduce the risk of an outbreak, we believe it prudent that FS test all personnel before they are mobilized on the fire and specify in the WFRPs their plans for testing. Testing all personnel prior to a fire assignment could provide FS with increased assurance that fire staff are less likely to have contracted COVID-19 prior to the fire assignment.

Lawmakers also recognized the importance of testing fire personnel. On June 9, 2020, the Senate Committee on Energy and Natural Resources held a hearing on wildland fire

² Coronavirus Aid, Relief, and Economic Security Act, Pub. L. No. 116-136 (2020).

³ In reviewing the WFRPs, we did not employ the use of any medical or emergency management specialists, nor are we those specialists. In reviewing the information in the WFRPs, we relied on the guidance issued by these various health organizations, as well as the National Wildfire Coordinating Group's (NWCG) *Infectious Disease Guidance for Wildland Fire Incidents*.

⁴ Summary USDA Reopening Playbook. The Summary USDA Reopening Playbook is publicly available on the following website: <https://www.usda.gov/sites/default/files/documents/summary-usda-reopening-playbook.pdf>.

⁵ USDA COVID-19 Playbook, Version 2.0, Supplement to Pandemic Plans, Occupant Emergency Plans & Continuity of Operations Plan, effective March 19, 2020. The USDA COVID-19 Playbook is publicly available on the following website: <https://www.usda.gov/sites/default/files/documents/COVID19%20Playbook.pdf>.

management in the midst of the COVID-19 pandemic. During the hearing, FS testified that it was not requiring fire personnel to be tested for COVID-19 prior to being mobilized on a fire. Prior to the hearing, Senators Joe Manchin and Tom Udall introduced the *COVID-19 as a Presumptive Disease in Wildland Firefighters Act* to protect Federal firefighters in the midst of the COVID-19 pandemic.⁶ The Act would require all firefighters to be tested for COVID-19 before the beginning of fire season or before firefighters perform any work as a firefighter during the fire season.

2. None of the WFRPs included asking fire personnel assigned to a fire about their recent travel. All of the WFRPs included the *Wildland Fire COVID-19 Screening Tool*, which includes questions about fevers, chills, muscle aches, and a new loss of taste and/or smell. Asking specific questions to identify where fire personnel traveled before being mobilized on the fire, or if the fire personnel was in contact with others who may have traveled, is also critically important for fire managers to know because of the increase of COVID-19 cases in certain areas of the country and around the world. We suggest referring to Attachment B of the USDA COVID-19 Playbook to enhance the WFRP protocols.⁷
3. None of the WFRPs contained a contingency plan should there be an outbreak within the fire camp where several fire personnel become infected with COVID-19 that causes a significant reduction in the available number of fire personnel needed to combat the fire. The plans only recommended that fire managers consider how they would be affected by a reduction in available resources. We believe that a contingency plan is critical for ensuring that FS is adequately prepared to compensate for the loss of firefighting personnel in order to continue its efforts in combating the wildfire, while at the same time containing the spread of COVID-19.
4. None of the WFRPs contained a contingency plan for aerial resources should they also be impacted by a COVID-19 outbreak. Several of the WFRPs only referenced using the National Guard's aerial resources. We believe that a contingency plan for aerial resources is also critical for ensuring that FS is adequately prepared to compensate for the loss of these resources in order to continue its efforts in effectively combating wildfires.
5. None of the WFRPs provided guidance on notifying the Geographic Area Coordination Center (GACC) if there is an outbreak, along with any adjustments that would need to be made to firefighting operations, such as the demobilization and reassignment of

⁶ COVID-19 as a Presumptive Disease in Wildland Firefighters Act, 116th Cong. § 2 (2020) (unpublished U.S. Senate bill).

⁷ The following is one of the screening questions asked in Attachment B of the USDA COVID-19 Playbook: *In the last 14 days, have you or someone living in your household, or someone with you have been in close or frequent contact with, or someone you are caring for returned from, or made a travel connection through a CDC Level 3 or Level 2 country, or State Department Level 3 or Level 4 country, for example China, Korea, Japan, the European Union, Iran?*

firefighting personnel working on a fire. Most of the WFRPs did provide a link to NWCG's *Infectious Disease Guidance for Wildland Fire Incidents*, which contained the protocol for notifying the GACC of the outbreak. However, given the importance of the guidance, the WFRPs should more fully address it in the plan, as well as include it as an appendix, so that it is more readily available when needed on a fire incident.

6. None of the WFRPs adequately addressed what FS would do if it encountered personal protective equipment (PPE) shortages during a wildfire. Although the WFRPs did not specify how they would handle PPE shortages, some of the WFRPs did suggest, as a best business practice, that personnel working on a fire bring their own PPE to supplement that provided at the fire incident. The Summary USDA Reopening Playbook states that mission areas and agencies (such as FS) should plan on providing face covering or masks to all "onsite" employees throughout the facility reopening process. Considering the importance of PPE in protecting FS personnel from COVID-19 while working under any condition and in any location, all of the WFRPs should fully address how they will effectively deal with potential PPE shortages.
7. None of the WFRPs required the medical units assigned to the fire to ensure they had sufficient supplies of infectious disease barrier kits.⁸ These kits are instrumental to the medical units and other support staff in screening and treating symptomatic fire personnel and sanitizing areas that may have been affected by COVID-19. Most of the WFRPs did provide a link to NWCG's *Infectious Disease Guidance for Wildland Fire Incidents*, which stated the need for the incident medical unit leaders to determine the minimum number of kits needed for a fire. However, given the importance of the guidance, the WFRPs should more fully address it in the plan, as well as include it as an appendix, so that it is more readily available when needed on a fire incident.
8. None of the WFRPs specifically addressed the protocols for quarantining and isolating symptomatic fire personnel. Most of the WFRPs did provide a link to NWCG's *Infectious Disease Guidance for Wildland Fire Incidents*, which does provide detailed protocols on how to quarantine and isolate symptomatic fire personnel. However, given the importance of the guidance, the WFRPs should more fully address it in the plan, as well as include it as an appendix, so that it is more readily available when needed on a fire incident.
9. While all of the WFRPs mentioned contact tracing as a best business practice, none of the WFRPs contained sufficient detail regarding how contact tracing would be administered for those symptomatic fire personnel placed in quarantine or isolation. According to CDC, contact tracing is a core control measure to prevent further transmission of the disease.⁹ More specific information is needed for administering contact tracing at a fire incident. Examples of questions that could be adapted for WFRP

⁸ Infectious disease barrier kits are designed for medical units to have on hand in order to assist in the treatment of symptomatic fire personnel. The kits contain protective clothing, gloves, glasses, shoe and boot covers, and a four to six gallon biohazard bag,

⁹ *Contract Tracing – CDC's Role and Approach*.

purposes can be found in Attachment A of the USDA COVID-19 Playbook.¹⁰ At a minimum, answers to questions such as these could allow for immediate actions to reduce spread within the fire camp.

10. Several of the WFRPs did not require separate medical stations for COVID-19. Some of the WFRPs made reference to having more than one medical station, but several of the WFRPs did not require the fire camp to have separate COVID-19 related medical stations. CDC guidance states that medical facilities consider designating a separate area such as an ancillary building or temporary structure or nearby location as an evaluation area where patients with symptoms of COVID-19 can seek evaluation and care.
11. None of the WFRPs designated an overall coordinator within the incident command structure to address COVID-19 related issues. Most plans delegated this responsibility to the various incident management team units (for example, Medical, Facilities, Fire Information and Safety). As outlined in the USDA COVID-19 Playbook, a Pandemic Coordinator helps ensure that all COVID-19 related issues are adequately, timely, and consistently addressed. Designating an overall coordinator could greatly enhance addressing COVID-19 related issues during a fire incident.
12. Most of the WFRPs did not specifically require sanitization stations within the fire camps. The plans only stated that they consider additional sanitary facilities to accommodate personnel cleanliness. The Summary USDA Reopening Playbook states that mission areas and agencies (such as FS) will take into account a facility's plans to ensure sufficient social hygiene practices are in place to protect employees and contractors by adhering to CDC Guidance on proper hygiene. As with USDA facilities, to avoid transmission of COVID-19, the WFRPs should require that the appropriate number of sanitary stations be established within the fire camps based on their size and the number of personnel working in the fire camps.
13. While all of the WFRPs mentioned social distancing of six feet, none of the WFRPs recommended holding necessary meetings outside. CDC determined that large gatherings in enclosed areas increase the risk of transmission of COVID-19. Holding meetings outside to the extent possible while still maintaining social distancing of six feet and wearing face coverings could significantly reduce the risk of transmission.

We trust that this information is helpful to you as FS enters the 2020 wildfire season. We appreciate the opportunity to review and comment on the WFRPs and have attached, in its entirety, the agency's response to the memorandum. This memorandum contains publicly available information and will be posted in its entirety to our website (<http://www.usda.gov/oig>).

¹⁰ Attachment A of the USDA COVID-19 Playbook, *Interview of an Employee or Visitor at USDA Who Tests Positive for COVID-19*.



File Code: 1430
Route To:

Date: August 4, 2020

Subject: Forest Service Response to OIG Review of Wildland Fire Response Plans

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

Thank you for the opportunity to review and comment on the memorandum containing Office of Inspector General's (OIG's) comments on the Wildland Fire Response Plans, which the U.S. Department of Agriculture's Forest Service participated in developing. The Wildland Fire Response Plans were initiated under the direction of the National Multi-Agency Coordinating Group to more safely and effectively combat wildland fires during the coronavirus (COVID-19) pandemic. Subject matter experts organized into three national area command teams and one geographic area incident management team and developed the plans over a several week period.

This year, more than ever, requires constant assessment, learning and adaptation in the wildland fire environment. The Forest Service is a learning organization and to that end we are updating processes and protocols in real time as new information and best practices emerge. We are listening to firefighters on the ground, fire leaders in our agency, and our partner agencies. We conduct focus groups each week; use rapid After Action Reviews; and share Lessons Learned. We intend to continue making adjustments as needed throughout the remainder of the fire year. This OIG review will help us do that, and the Forest Service supports the recommendations and appreciates the time and effort that went into the OIG memorandum.

The ten interagency Geographic Area Coordinating Groups have adopted their respective Wildland Fire Response Plans. They have directed incident management teams to utilize the plans as we move through an ever evolving and complicated fire year and pandemic situation. It should be noted that Wildland Fire Response Plans are not Forest Service documents, but rather are the result of a tasking by the National Multi-Agency Coordinating Group. This group is comprised of seven voting members:

- Five represent the federal wildland fire agencies;
- One represents the National Association of State Foresters; and
- One represents the Federal Emergency Management Agency and the U.S. Fire Administration.



The Forest Service has one of seven votes in this forum. Updates to the Wildland Fire Response Plans as a whole require extensive coordination with these partners. We recommend clarifying the first paragraph of the memo to make the authorship of the plans clear.

The Wildland Fire Response Plans were drafted during March, April, and May of 2020, and were based on the best available information at the time. Global understanding of COVID-19 management has changed significantly since the plans were drafted. As an interagency community, we have quickly evolved in how we provide guidance to the field in an effort to be more nimble and responsive to new information.

In addition to the Wildland Fire Response Plans, several guidance documents have been distributed by the Fire Management Board, which is an interagency governance body. These documents include:

- Adjustments to Wildland Fire Preparedness Activities for the 2020 Fire Year in response to COVID-19;
- Interim Guidance for Prevention of Coronavirus Disease (COVID-19) During Wildland Fire; and
- Guidance on Laboratory Testing for Coronavirus Disease Operations.

Although these documents are not official Forest Service policy, they do provide a platform for standard operating procedures which are followed at interagency incidents. All of these documents can be found on the Fire Management Board webpage at the following link:

<https://www.nwcg.gov/partners/fmb#collapseM>.

As the Centers for Disease Control and Prevention (CDC) updates their guidance for critical infrastructure workers and the general public, the Forest Service will work with the interagency community and update appropriate screening, social distancing, and personal protective equipment protocols. The Chief of the Forest Service issued a letter in June 2020 that provided a framework and strategy for fire response in a COVID-19 environment. The Chief's letter emphasized the importance of learning and adaptation, as well as a commitment and a priority to the safety for fire responders and the public while carrying out our wildfire mission responsibilities.

On a more site-specific level, interagency incident management teams have adopted practices aligned with the Wildland Fire Response Plan documents to conduct wildland fire suppression activities in the safest and most effective means possible. These practices are responsive to OIG's Observations/Suggestions, particularly numbers 5, 10, 12 and 13. Examples include:

- Identification of a COVID-19 support medical unit within our Incident Management Teams (IMTs);

- Increasing the number of available sanitation stations on incidents;
- Daily upward reporting of significant COVID-19 related issues by IMTs as part of the situation report process; and
- Holding meetings outside to the greatest degree possible.

These practices continue to evolve as more is learned about COVID19, coupled with knowledge gained by each team to improve effectiveness. An effective lessons learned effort is being conducted each week to share findings amongst incident management teams which is supporting very timely collective learning and adaptation of practices.

The Fire Management Board also established the COVID-19 Wildland Fire Medical and Public Health Advisory Team. Their purpose is to address medical and health-related issues specific to the interagency administration of mission critical wildland fire management functions in a COVID-19 modified operating posture. The COVID-19 Wildland Fire Medical and Public Health Advisory Team is tasked with providing:

- Medical and public health expertise;
- Advice, coordination, and collaboration with external subject matter experts; and
- Development of protocols and practices for all aspects of COVID-19 planning, prevention, and mitigation for wildland fire operations.

The Forest Service maintains alignment with the CDC and recognizes the importance of testing as a mitigation strategy to slow the spread of COVID-19. As such, the Chief issued a letter on July 2, 2020, that provides direction for all firefighters to be tested if they are either symptomatic or have had meaningful exposure to the disease and describes how Forest Service employees may obtain and pay for testing. The letter also details how to procure alternative housing, when necessary, for those who test positive for COVID-19 or are awaiting test results, and defines their duty status during this time. These efforts will not only support the health and safety of our firefighters to ensure sustained operational capability, but also apply to all Forest Service employees. We will continue to evaluate and update our testing protocols as global understanding of COVID-19 and testing availability, reliability, and timeliness of results evolve.

The Forest Service understands the importance of the wildland fire response mission. As a recognized world leader in wildland fire, we have and continue to innovate and adapt to the challenge of operating in a new COVID-19 environment. The Forest Service is not alone in this mission and works in close collaboration with other Federal, State, and Local entities; which depend on one another to provide firefighting resources to respond to wildfires across all jurisdictions. The interagency governance structure of the national and geographic area coordination centers continually manages the availability of both ground and aerial resources to ensure we are able to safely, appropriately, and aggressively respond to wildfires.

We are happy to provide additional information as requested to demonstrate our progress in managing COVID-19 impacts to wildland fire response efforts. Please contact Antoine L. Dixon, Chief Financial Officer, at (202) 205-0429 or antoine.dixon@usda.gov with any questions.

Sincerely,

VICTORIA CHRISTIANSEN /S/
Chief

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