



NATIONAL FEDERATION OF FEDERAL EMPLOYEES

Affiliated with the International Association of Machinists & Aerospace Workers, AFL-CIO

September 20, 2022

Secretary of Agriculture Tom Vilsack
Under Secretary for Natural Resources Homer Wilkes
U.S. Forest Service Chief Randy Moore
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Re: Urgent Retention Problems Among the Wildland Firefighter Workforce and Next Steps

Dear Secretary Vilsack, Under Secretary Wilkes, and Chief Moore,

Thank you for your letter of August 24, 2022, in reference to wildland firefighter pay, occupational series, and housing. On behalf of the thousands of wildland firefighters that NFFE represents, we thank you for your commitment to improve the working conditions for this crucial workforce with appropriate pay, an accurate occupational series, mental health support, and safe and affordable housing. As you know, implementing solutions to these issues will help prepare the nation's federal wildland firefighting services for the immense challenges in the coming years to protect life and property, including the critical infrastructure located within the 193 million acres of National Forests and Grasslands.

We share the common goal of ensuring retention and increasing recruitment of wildland firefighters. There is no substitute for qualified, experienced firefighters who can pass on their skills and knowledge to new recruits. This critical tradition has been limited, but today many are acting to restore it. Given that, I would like to provide the following observations with you that we have learned through feedback from our members during our continuing discussions to achieve our common goals for the wildland firefighting service.

MAKE THE PAY INCREASE PERMANENT. NFFE members are still facing financial insecurity because the recent pay increase approved and funded in the Infrastructure Investment and Jobs Act (IIJA) is only temporary. As such, firefighters continue to look for and take jobs outside of federal service. Our employees are unquestionably dedicated to their careers and their country as federal wildland firefighters. However, pay parity, mental health, burnout, and housing issues persist, forcing many to leave federal service for other job opportunities free of those burdens.

We are grateful for all that has been done to increase base pay, but it is insufficient by itself to stop the exodus. As partners in this challenge, we must vigilantly act, in a way employees can see, to demonstrate our commitment and desire for them to stay in federal service. A critical piece is to share as much as you are able to with employees on what USDA and USFS are doing to secure permanent solutions on issues relating to pay and other working conditions. This includes extending as many short-term offerings as possible to keep our valuable staff supported and stabilized.

REQUEST SIGNIFICANT OUTYEAR FUNDING. With the limited funding provided through the IIJA, NFFE would like to work with USDA and USFS to secure needed funding in the future to ensure that no employee who received an increase to Base Pay must endure a cut, as unlikely as that may be. Likewise, NFFE wishes to do its part to ensure that no larger staffing problems arise if adequate funding is not provided through FY 2023 and beyond. While NFFE remains respectful of protocols related to the President's budget, in the interest of full disclosure, we have raised this issue with Congress and will continue to engage on the issue of outyear funding with congressional authorizers and appropriators.

MAKE OVERTIME ADJUSTMENTS TO PAY RAISES AND CORRECT SHORTFALLS. Regarding the issue of increases to Base Pay provided in the IIJA, many on your staff have done monumental work to issue the pay supplements to thousands of employees across the country. Our members thank you. We have received some reports that the pay increases for some firefighters fell short of the \$20,000 or 50% increase to Base Pay (whichever is less). Our members seek a reliable method, such as a calculator tool applying the formula used by the Forest Service, to verify payments to date are appropriate and plan for any future payments with peace of mind. Such a tool would also lessen the number of unwarranted claims for adjustment and potentially minimize the burden of processing corrections. In addition, employees remain concerned about how the overtime pay under the FLSA is being calculated and if the records used to calculate those payments are accurate. Many employees report they coded their time without great attention to detail because at the time it was an inconsequential administrative act, this was the practice and supervisors approved. We request the Forest Service communicate directly if, when, and how employees must recode their time to ensure they receive accurate overtime pay.

INCREASE STAFFING AT HIGHER GRADES. Some experienced employees who have left the Forest Service are willing to come back if pay is increased and stabilized. Meantime, recruiting new employees with comparable experience and training is virtually impossible. NFFE was informed of a recent hiring and training pattern within the USFS that may cause safety concerns regarding proper training: newer employees are performing at levels higher than their pay grade because of the need to replace higher grade firefighters who have left federal service. This situation is compounded by existing vacancies in the workforce that go unfilled for a year or longer. All employees report that it is common to perform duties well above and beyond their position descriptions. A new organizational chart may be needed to reflect the needs of our complex, dynamic fire program so that all employees are properly compensated for their dangerous and critical work.

NFFE requests a discussion with Chief Moore regarding staffing issues, training, and safety ensure that firefighters are properly placed and trained for the individual missions required of them. Such a discussion would promote what we see as a cornerstone requirement for improved and modernized operations: deep understanding of the work our employees actually perform in the field to respond in emergencies and achieve the mission. Our goal is to augment USFS's existing mission needs analysis and improve the success rate when ultimately grading the duties of federal employees in the new series, particularly those who fill those emergency orders.

ESTABLISH CAREER LADDERS. For some time, we have mutually discussed the issue of career ladders and mobility within the wildland firefighting service. As you know, career ladders and job mobility are critical to expand a firefighter's expertise, prevent burnout and improve retention.

Position descriptions (PDs) do not currently list the qualification(s) a firefighter holds on the fire line for any position below a GS-9. However, our members are acquiring and using qualifications to perform duties outside of their PD all the time. The way in which the work is currently performed naturally conforms to a career ladder, except our members are not paid, recognized or promoted along one. Please consider giving cash awards for employees who use qualifications and certifications on emergencies as an immediate available fix. As USFS makes changes to structural workforce policies and builds upon a new occupational series over the long run, consider structuring a career ladder similar to the one the Department of Homeland Security uses for Customs and Border Protection Officers. Progression along the ladder would occur with time-served, as well as additional criteria subject to collective bargaining.

PAY FOR QUALIFICATIONS AND CERTIFICATIONS. Additionally, NFFE requests that USFS maintain existing pay differentials and establish qualifications-based incentive pay. Firefighters deserve to be compensated for possessing skills, certifications and qualifications above the minimum required, but also the Agency may then more easily track such skills within the workforce to ensure all occupational specialties are fulfilled where needed. Hazard pay is also appropriate for this work.

DEVELOP A ROBUST OCCUPATIONAL SERIES. We recognize that implementing unprecedented, substantial, and permanent improvement is painstaking and time-consuming work. We appreciate every opportunity you have given our members to participate and be heard in the position description development over the past many months. We are also pleased the Agencies acted on our input and recently secured additional time to complete the implementation of the new series. We acknowledge the order of this task is inherently backwards and share frustrations over what appear to be immovable confines of existing systems, but we must overcome these challenges with the opportunity we have now.

We offer the following observations to ensure clear, open communication about expectations and current perceptions of the work undertaken thus far. We also include NFFE's suggested solutions to realign the work with our shared goals.

1. **REMOVE THE APPARENT BAN ON UPGRADING.** We are concerned that management does not have authority to upgrade positions where an upgrade would be appropriate. The occupational series must not be limited to only what current budget ceilings allow. The requirements for truly fair pay should drive funding, not the other way around.
2. **WRITE ACCURATE POSITION DESCRIPTIONS; INCLUDE GRADE-CONTROLLING DUTIES AND QUALIFICATIONS.** We are concerned the current position descriptions are written too narrowly and exclude many critical duties. The position descriptions include only minimum qualifications; however, it is rare for fire personnel to carry only the minimum qualifications. Firefighters deserve credit and pay for grade controlling emergency duties which they may perform less than 25% of their time. If the U.S. Forest Service stays the current course, over four hundred positions covering more than 10,000 employees will need desk audits. Position descriptions that have already been graded need to be reviewed using an expanded scope of possibilities and revised to capture the true nature of the work.
3. **CLASSIFY FOR ACTUAL SKILLS AND QUALIFICATIONS; USE MIXED GRADES.** We are concerned the current approach to developing the new occupational series for wildland

firefighters may not reach what Congress intended to achieve. The purpose is to not just create a new series for firefighters to satisfy the letter of the law, but to substantively resolve the issue with classification failing to accurately reflect their work and compensate them accordingly. A fair system would pay firefighters according to their actual skills and qualifications rather than where an occupational series is reflected upon an agency organizational chart. A mixed-grade approach would more accurately capture the actual duties of a wildland firefighter. We ask that you review the current approach very carefully and make adjustments where appropriate so that the needs of employees are prioritized.

4. FOLLOW OPM GUIDANCE. We request the USFS adhere closely to the OPM guidance for the new 0456 wildland fire management job series dated June 2022. We recently requested OPM assign an appropriately qualified classifier to assist the USFS team during review and classification. We invite you to join us in that request.
5. GRADE POSITIONS TO MATCH OR EXCEED EARNING POTENTIAL IN NON-FEDERAL WILDLAND FIREFIGHTER JOBS. The federal government must become a model employer. Retention problems will persist as long as the USFS underpays and underrecognizes wildland firefighters compared to the compensation packages state and private wildland firefighters enjoy. At a minimum, this work must achieve pay parity. To truly become a model employer and to restore integrity of the federal wildland firefighter workforce, these jobs must offer the most competitive compensation packages.

On behalf of NFFE, I appreciate the opportunity to share these concerns with you and we look forward to our continuing conversations and efforts to build a wildland firefighting workforce that can answer the immense challenges of the next generation and beyond. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Randy Erwin', with a stylized flourish at the end.

Randy Erwin
National President
National Federation of Federal Employees,
IAMAW, AFL-CIO