



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

October 23, 2023

Memorandum

To: Bureau Human Capital Officers
Bureau Human Resources Directors
Bureau Fire Directors

From: Jennifer A. Ackerman
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Subject: Wildland Firefighting Experience for Secondary (Administrative) Positions

This memorandum provides clarifying guidance and is intended for use in bureaus and equivalent offices for identifying relevant firefighting experience, to aid in the development of appropriate specialized experience statements in accordance with Office of Personnel Management (OPM) policy, and to provide clarity when filling positions approved for Secondary (Administrative) Firefighter Retirement. This memo supersedes the Department's August 7, 2009, memorandum "Qualification Requirements for Firefighter Positions Covered by Secondary (Administrative) Retirement Coverage."

Background

Interior's 2009 memorandum for qualification requirements was established to ensure a uniform application and equitable approach to determine wildland firefighting experience. This included a minimum amount of tangible experience, verifiable by number of days (90). This methodology was not to impede upon established eligibility and qualification for general employment, but to reiterate the basic criteria by which certain positions and candidates are evaluated, and to substantiate or maintain/continue coverage under Secondary (Administrative) Retirement rules and regulations, where appropriate.

In the absence of an explicit occupational series dedicated to wildland fire management, positions were classified to either the GS-0401 or GS-0462 series. At the time, this guidance

provided a plausible distinction between natural resource management/biological science work and specialized wildland fire management work.

OPM's introduction of the new classification standard for [Wildland Fire Management: 0456](#) provides a concise standard involving technical and specialized work in the protection of forest or range lands and resources from fire. 5 CFR Part 842 contains OPM regulations which establish and describe special retirement eligibility for (wildland) firefighters employed under FERS; while coverage is not mandatory, prior wildland firefighting experience (defined in the 5 CFR 842.802) is a mandatory prerequisite to retain special firefighter retirement when transitioning from a primary (rigorous) covered position to a secondary (administrative) covered position. Determination under 842.803 (b) or (c) must be based on the official position description and any other evidence deemed appropriate by the agency head for making the determination.

Analysis

The term "basic qualification" has consistently been interpreted by OPM to mean a fundamental or essential requirement; however, during the interim roll-out of special retirement regulations, agencies expressed confusion about the term's meaning. OPM sought to clarify this in the final regulations by using the term "mandatory prerequisite." This change was made in the CSRS regulations governing law enforcement officers and firefighters on December 17, 1987 (see 52 FR 47893). The regulation provided some liberalization in the policy by expressly allowing for the experience requirement to be satisfied by equivalent work outside the Federal Government.

OPM also clarified in [57 FR 32690](#), that longstanding policy in retirement administration has been that any administrative secondary position must require "past experience" in a primary position. Coverage of administrative staff under the early retirement plan is justified only if it is necessary to fill the administrative positions with [current] employees covered under the plan, who, if not allowed to continue the special retirement coverage, would not be willing to accept administrative posts. Where past primary position experience is not needed in the administrative position, the Interior's ability to staff its administrative functions is enhanced because hires can be made from sources other than primary positions.

Finally, OPM qualifications policy offers clarity on the term "screen-out"; referring to any specific rating criteria (i.e., competency or special qualification) without which, any candidate could not perform the duties of a position in a satisfactory manner. Qualification standards are intended to identify applicants who are likely to perform successfully on the job, and to screen out those who are unlikely to do so. Bureau subject matter experts have expressed concern about potential for negative impact to recruitment efforts with use of such a selective factor, particularly where case-examining (public talent sourcing) is concerned; contrary to OPM's intent.

Policy Determination and Implementation

- OPM's Position Qualification Standard for Wildland Fire Management, 0456, identifies key skills and qualifications needed for performing wildland fire management work government wide. The standard includes minimum qualifications required for performing

wildland fire management work and will be used by agencies to help improve the recruitment and hiring of talent with the needed wildland fire fighting skills. OPM's wildland firefighting experience is determined during the job analysis (e.g., one year of specialized [wildland firefighting] experience, as defined for the position in question). Additional measurements of qualifications beyond OPM's definition of "basic" (i.e., 90-day selective placement factor) is redundant with specialized experience requirements given the introduction of an occupational series specific to wildland firefighting and should no longer be used. This does not preclude use of other selective placement factors, where warranted and documented in the job analysis.

- Secondary administrative positions must be predetermined (certified as eligible for coverage) by the Agency head [designee; OHC] for coverage for special retirement prior to filling each position. This does not mean that Interior places any requirement for an incumbent to be covered by a special retirement provision, rather that the position has been reviewed and certified for coverage, in the event the incumbent is a current federal employee (i.e., Primary Covered) employee. Interior will continue use of the Certification of Positions Approval for Retirement, however will amend language for recommendations for coverage, as follows:

“This is an administrative position in an organization having a firefighting mission, and is clearly in an established career path. Prior firefighting experience, as gained by substantial service in a primary firefighter position or equivalent experience outside the Federal government is a MANDATORY PREREQUISITE.”