



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

DOI WILDLAND FIRE PROGRAM POLICY MEMORANDUM No. 2020-007

From: Jeffery Rupert - Director, Office of Wildland Fire
Subject: Guidance on Execution of Supplemental Funding Under COVID-19 Pandemic
Effective Date: *June 26, 2020*
Expiration Date: *September 30, 2021*

Purpose: This memorandum provides budget guidance for the supplemental funding provided through the Coronavirus Aid, Relief, and Economic Security (CARES) Act (Public Law 116-136) to support the Department of the Interior (DOI) Wildland Fire Management (WFM) program. This memorandum outlines general provisions associated with the execution of CARES Act funding approved by DOI's Office of Budget (POB) and provided to the Bureau of Indian Affairs (BIA), the Bureau of Land Management (BLM), the Fish and Wildlife Service (FWS), the National Park Service (NPS), and the Office of Wildland Fire (OWF).

Background: The CARES Act, signed into law on March 27th, 2020, provided the Department of the Interior \$756 million, including \$453.0 million for BIA and \$158.4 million for the Office of the Secretary (OS), to remain available until September 30, 2021, to prevent, prepare for, and respond to coronavirus, domestically or internationally. In accordance with guidance issued by POB on March 31, 2020, OWF worked with BIA, BLM, FWS, and NPS to submit an Operating Plan specific for WFM program needs.

OWF typically coordinates the development of WFM policy and direct allocation of the annual WFM appropriation. However, CARES Act funding for implementation Department-wide was appropriated to OS to transfer to other bureaus/offices which includes funding related to WFM programs. POB is administering the approval and allocation process for DOI CARES Act funding and the direct transfer of funds for Interior bureaus/offices which did not receive CARES Act funding through a direct appropriation. For this reason, for wildland fire management program requirements, approved CARES Act funding for BIA fire will be executed from BIA's direct appropriation, and the Office of Budget will transfer approved CARES Act funding directly to BLM, FWS and NPS. OWF continues to coordinate the execution of this funding and all associated implementation policies.

Approval of CARES Act funding for WFM program needs is ongoing and additional guidance will be issued accordingly.

Coordination: POB, Bureau Fire Directors and Fire Budget Leads were consulted in the development of this PM.

Scope: This Policy Memorandum applies to the Department of the Interior's bureaus and offices responsible for wildland fire management activities.

Existing Policy Affected: N/A

Authority: Public Law 116-136

Policy: The following policy applies based on the category of funding approved and transferred to the

bureau for WFM program needs as of the date of this memo:

Temporary Facilities

On April 24, 2020, \$10,896,000 was approved for WFM Social Distancing requirements:

Bureau	Approved Amount
BIA	\$1,856,000
BLM	\$3,223,000
FWS	\$2,379,000
NPS	\$3,438,000
Total Funding	\$10,896,000

This funding is available to meet the request outlined in the Operating Plan to support acquisition of alternative facilities to maintain social distancing and quarantine protocols. The additional temporary facilities, including alternative lodging, are needed to support wildfire readiness and response under the COVID-19 pandemic. These facilities include:

- Initial Attack Facilities – Additional facilities to serve as temporary ready rooms or staging areas to ensure crew members in firefighting modules are separated to reduce the risk of exposure and outbreak across entire fire units. This will facilitate compliance with local and state mandates on social distancing and allow bureaus to maintain readiness for initial attack. These additional facilities may also be used as temporary dispatch centers when needed. Where applicable, funding may be used for costs associated with the use of existing outstations and day stations to serve as initial attack facilities.
- Crew Quarters – Additional facilities or equipment to allow firefighters in existing government housing units with common shared living areas to be separated to reduce the risk of exposure and outbreak across entire fire units. This will facilitate compliance with local and state mandates on social distancing and provide availability of additional housing units that can also be used for quarantine/isolation purposes when needed. Bureaus have the flexibility to determine the appropriate facility types needed, to include additional government housing, rental of trailers/RVs, or other alternative commercial lodging options (e.g. hotels). Bureaus must consider the best business case value available when making acquisition decisions including any associated long-term costs.

Bureaus are advised to fund temporary facilities needed to address pandemic concerns during the 2020 fire season. Facilities will address the need to limit daily interactions and implement appropriate social distancing requirements to mitigate the risk of exposure. These mitigating strategies will help prevent outbreaks across the entire fire unit and impact the availability of workforce capacity during the fire season.

CARES Act funding is provided to address specific needs during the COVID-19 situation, and the social distancing funding is meant to provide surge capacity to address this unique situation this fire year. For this reason, bureaus should assume the additional facility capacity is a short-term requirement. Bureaus may consider purchase versus leasing where it is more cost beneficial to the government (e.g. ongoing maintenance, storage, and transportation) or there are no other cost beneficial options. Any ongoing costs associated with ownership must be covered by regular annual appropriations after the pandemic impacts cease. Leasing of equipment for use in temporary facilities is allowable if they are needed to facilitate social distancing and quarantine protocols.

Overtime, Premium Pay, and Hazard Pay (OPHP)

On April 24, 2020, \$300,000 was approved for WFM OPHP:

Bureau	Approved Amount
BIA	\$25,000
BLM	\$200,000
FWS	\$75,000
Total Funding	\$300,000

These amounts reflect the estimated OPHP costs for two months of estimated OPHP. For actual obligations that exceed the approved amounts, bureaus are encouraged to use the annual WFM appropriation for OPHP as needed, in accordance with bureau standard operating procedures.

Personal Protective Equipment (PPE) and Cleaning

On May 18, 2020, \$107,000 was approved for PPE/cleaning services obligations as of May 1:

Bureau	PPE Approved Amount	Cleaning Approved Amount
BIA	\$1,000	
BLM	\$101,000	\$3,000
FWS	\$1,000	
NPS	\$1,000	
Total Funding	\$104,000	\$3,000

As this funding is intended for reimbursement of actual obligations incurred, bureaus are encouraged to use the annual WFM appropriation for additional costs of PPE and cleaning services as needed, in accordance with bureau standard operating procedures. Bureaus may pursue individual ordering of PPE at local levels, and bureaus are advised to coordinate with the Department as needed to communicate the status of such procurement.

Retroactive Application of Funds

Bureaus may apply CARES Act funding for valid COVID-19 related expenses incurred prior to the enactment of the CARES Act. Language in the CARES Act retroactively makes the supplemental funding available for COVID-19 related expenses back to the beginning of the fiscal year. Consistent with authority in the Account Adjustment Statute (31 USC 1534) and the flexibilities provided in the CARES Act, valid coronavirus-related charges made during the fiscal year can be moved to obligate against CARES Act funding. Bureaus should use the appropriate FBMS transaction type to move eligible costs to the relevant Fund.

Documentation/Reporting

Bureaus are advised to maintain the necessary supporting documentation in accordance with bureau standard operating procedures and demonstrate decision-making processes associated with the application and justification of the approved CARES Act funding.

The Department is required to report centrally on the execution of CARES Act supplemental funding at multiple levels of details. The initial report to Congress for the OS funding is due 90 days after enactment (June 25, 2020), with monthly reports due thereafter. All supplemental funding execution reports will be automated in the Financial and Business Management System (FBMS) to ensure consistency across all reports and alignment at the appropriate level(s) of detail.

To allow for centralized Departmental reporting, bureaus have established unique Master Data structures in FBMS to track and monitor funding specific to the CARES Act. Please be advised the period of availability for the CARES Act fund is two years, expiring in September 30, 2021, in contrast with the no-year period of availability of the annual WFM appropriation.

Bureaus should ensure to follow internal control policies and procedures to track and monitor all COVID-19 obligations using the Work Breakdown Structure (WBS) element in FBMS. All COVID-19 related obligations incurred with the annual WFM appropriation should be tracked by the COVID-19 WBS code. Additionally, a separate coding structure, using a separate WBS code or functional area, should be established for each category of approved funding stream under the CARES Act (e.g. temporary facilities, OPHP, PPE/cleaning, and others as they are approved). Please coordinate with OWF and POB if there are challenges with tracking COVID-19 obligations funded from the CARES Act as specified in this guidance.

Contact: All questions regarding this Policy Memorandum can be directed to Thao Tran, Budget Officer, Office of Wildland Fire at (202) 606-0518.

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