



U.S. Department of Agriculture
Office of Inspector General



Assessment of Forest Service's Preseason Procurement Awards

Inspection Report 08801-0004-41

OIG determined that the Forest Service's acquisition process adequately identified firefighting equipment needs and issued I-BPAs to meet those needs in FY 2023.

OBJECTIVE

Our objective was to evaluate FS' procurement and administration of preseason contracts. Specifically, we evaluated how FS determined the quantity and type of firefighting equipment in FY 2023, and how FS ensured it contracted the appropriate amount of firefighting equipment in FY 2023.

REVIEWED

We reviewed FS' acquisition process for preseason firefighting equipment, including equipment evaluations and inspections for FY 2023.

RECOMMENDS

We recommend that FS develop and implement formal guidance for conducting technical evaluations and hands-on inspections to ensure that awards are consistent and comply with solicitation requirements.

WHAT OIG FOUND

To ensure readiness and an effective response to wildfire incidents, the Forest Service (FS) uses Incident Blanket Purchase Agreements (I-BPAs) to obtain preseason equipment, supplies, and services. These agreements allow the agency to improve cost efficiency and vendor effectiveness. According to FS data, the agency paid more than \$310 million to vendors through preseason I-BPAs during fiscal year (FY) 2023. Fire and Aviation Management (FAM) works with the Equipment and Services Branch (ESB) to ensure that firefighting equipment and other resources acquired through I-BPAs meet FS' operational needs and comply with procurement laws and regulations.

The U.S. Department of Agriculture (USDA) Office of Inspector General (OIG) determined that FS' acquisition process adequately identified firefighting equipment needs and issued I-BPAs to meet those needs in FY 2023. However, we found that two of the three regions we reviewed did not consistently evaluate equipment in accordance with the I-BPA solicitation. This occurred because FS lacked formal guidance to address regional equipment concerns while basing awards on technical evaluations. As a result, FS may be at risk of vendor protests, which could increase the cost and the time needed to secure essential firefighting equipment.

FS officials generally agreed with our finding and recommendation, and we accepted management decision for the recommendation in the report.



OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



DATE: May 15, 2025

INSPECTION

NUMBER: 08801-0004-41

TO: Thomas M. Schultz Jr.
Chief
Forest Service

ATTN: Jennifer McGuire
Acting Chief Financial Officer
Forest Service

FROM: Steve Rickrode
Acting Assistant Inspector General for Audit

SUBJECT: Assessment of Forest Service's Preseason Procurement Awards

This report presents the results of our inspection of the Assessment of Forest Service's Preseason Procurement Awards. Your written response to the official draft is included in its entirety at the end of the report. Based on your written response, we are accepting management decision for the recommendation in the report, and no further response to this office is necessary.

In accordance with Departmental Regulation 1720-1, final action needs to be taken within 1 year of the date of each management decision. Please follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer.

We appreciate the courtesies and cooperation extended to us by members of your staff during our fieldwork and subsequent discussions. This report contains publicly available information and will be posted in its entirety to our website (<https://usdaoig.oversight.gov>) in the near future.

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Background and Objective

Background

The Forest Service (FS) manages wildfires in national forests and grasslands across nine regions. The agency ensures that it is ready and able to effectively respond to wildfires by conducting fire preparedness activities. As part of these activities, FS procures necessary equipment. To improve cost efficiency and vendor effectiveness, FS established the preseason Incident Blanket Purchase Agreements (I-BPAs) program, which it uses to obtain equipment that it commonly uses to meet fire incident needs.^{1 2} FS uses a web-based application, the Virtual Incident Procurement (VIPR) system, to solicit, award, and administer I-BPAs. According to FS data, the agency paid more than \$310 million through preseason I-BPAs in fiscal year (FY) 2023 to obtain firefighting equipment and other resources. Figure 1 details the resource category percentages for firefighting equipment and other resources ordered through preseason I-BPAs.^{3 4}

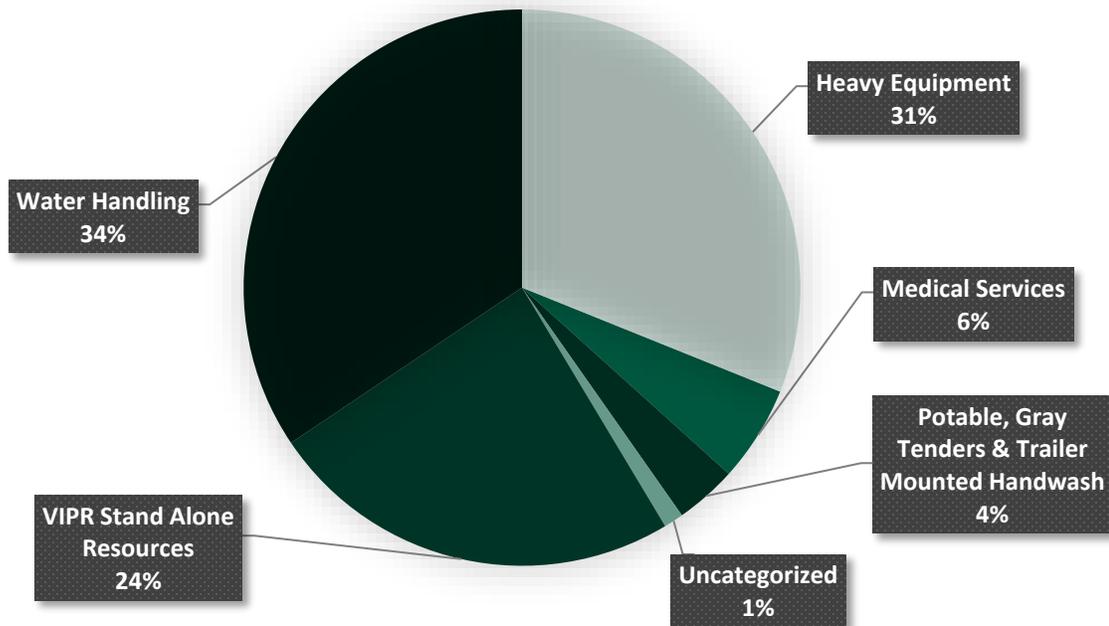


Figure 1: Resource Category Percentages for Firefighting Equipment and Other Resources Ordered Through FY 2023 I-BPAs in VIPR. Figure by OIG.

¹ A blanket purchase agreement is a simplified method of filling anticipated repetitive needs for supplies and services through the establishment of charge accounts with a qualified source of supply to facilitate future purchases.

² FS implemented a competitive solicitation process for preseason I-BPAs in response to an audit conducted by the U.S. Department of Agriculture (USDA) Office of Inspector General (OIG) in 2005.

³ VIPR stand-alone resources consist of variety of equipment, such as chipper, faller, fuel tender, incident base unit, mobile laundry, mobile sleeper unit, and vehicle with drive.

⁴ Water-handling equipment includes engine (type 3 to 6), support water tender, and tactical water tender.

FS awards I-BPAs on a best-value award process and the agreements typically last from 3 to 5 years. Awarded resources are listed on the *Dispatch Priority List* (DPL). Authorized dispatch personnel use the DPL to order equipment, when needed, for fire incidents.⁵

The Procurement and Property Services' Equipment and Services Branch (ESB) assists the regional Fire and Aviation Management (FAM) program with contracting necessary resources. FAM and ESB work together to ensure the I-BPA program meets operational needs and complies with procurement laws and regulations. Figure 2 describes the separate responsibilities of FAM and ESB.⁶

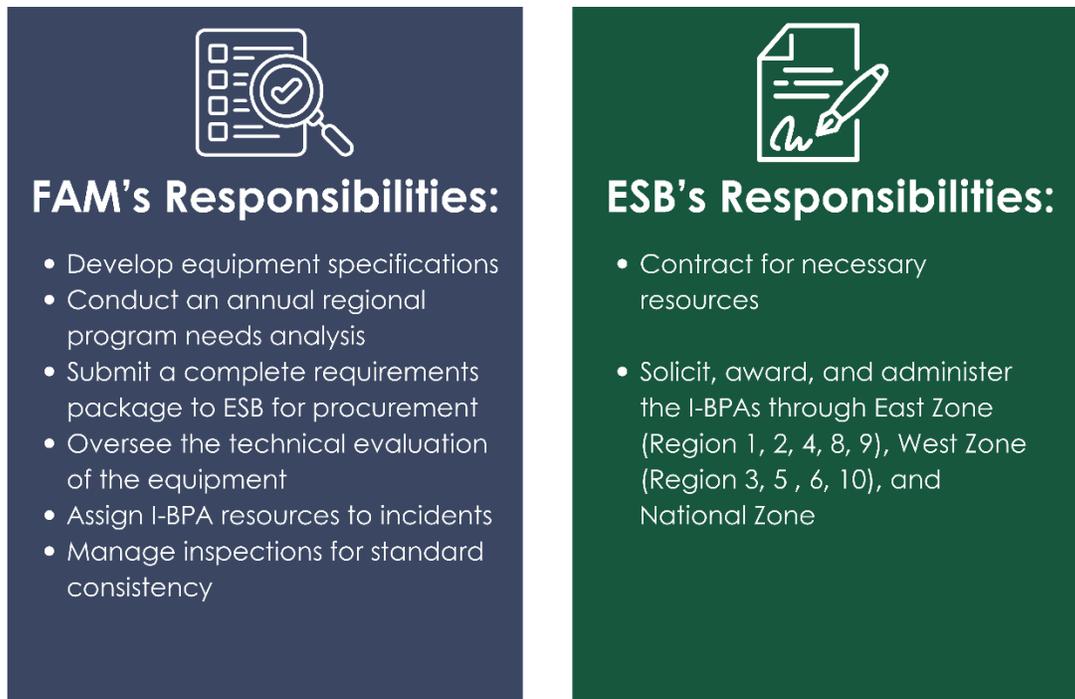


Figure 2: Responsibilities of FAM and ESB for I-BPA program. Figure by OIG.

FAM has developed the *National Solicitation Plan* (the *Plan*) to identify a solicitation cycle for competing equipment that is commonly used to support fire incidents.⁷ The Contract Equipment Technical Team, which is made up of FAM and ESB subject-matter experts, is responsible for developing and updating the equipment specifications and the I-BPA solicitation templates.

⁵ The DPL uses a ranking that is based on price, various equipment, and specified attributes.

⁶ Requirement package refers to all required documents needed for a new procurement. A requirement package includes a program needs determination, the program requirements, an independent Government cost estimate, and the evaluation factors and criteria.

⁷ Solicitation is the initial step in the acquisition process by which the agency requests quotes from potential vendors that are interested in I-BPA program participation.



Figure 3: Heavy Equipment Bulldozer. Photo by FS Washington Office-FAM, Incident Business Branch. It does not depict any particular audit or investigation.

According to FS officials, fire activity varies by region and season, making it difficult for FS to predict equipment needs. To address this, FS creates a vendor pool by awarding I-BPAs to as many eligible vendors as possible to ensure sufficient equipment is available to meet fire incident needs. If I-BPA resources are not sufficient to meet the needs of a fire incident, FS will use a noncompetitive Emergency Equipment Rental Agreement (EERA) to obtain additional equipment.⁸ FS reviews EERA data annually to identify frequently used equipment and to determine whether to add such equipment to the *Plan* to reduce costs.⁹ Furthermore, FS coordinates with the State and other Federal agencies to obtain resources during the fire season.

To further expand the vendor pool, FS instituted an onboarding process in FY 2023. Through the onboarding process, FS reopens selected solicitations each year to allow vendors that did not participate in the original solicitations to submit offers and compete for awards. This process allows new vendors to receive awards and existing vendors to add new equipment.

⁸ Incident-only EERAs are used to sign up contracted resources not available through the I-BPA competitive process because of availability or exhaustion of the DPL and the resources hired through other established dispatch ordering procedures. An incident-only EERA is only valid for the duration of the incident it was assigned to. Once the incident releases the contracted resource, the agreement is no longer valid.

⁹ According to FS, EERAs are often more costly than I-BPAs because they are established during emergencies when immediate resource needs arise, allowing vendors to charge higher rates because of the urgency of the situation and the lack of competition.

Objective

Our objective was to evaluate FS' procurement and administration of preseason contracts. Specifically, we evaluated how FS determined the quantity and type of firefighting equipment in FY 2023, and how FS ensured it contracted the appropriate amount of firefighting equipment in FY 2023.

Finding 1: FS Did Not Ensure Consistent Equipment Evaluation Across Regions

We determined that FS' acquisition process adequately identified firefighting equipment needs and issued I-BPAs to meet those needs in FY 2023.¹⁰ However, we found that two of the three regions we reviewed did not consistently evaluate equipment in accordance with the I-BPA solicitation. This occurred because FS lacked formal guidance to address regional equipment concerns while basing awards on technical evaluations. As a result, FS may be at risk of vendor protests, which could increase the cost and the time needed to secure essential firefighting equipment.

The Federal Acquisition Regulation (FAR) requires agencies to evaluate vendor offers based on the criteria outlined in the solicitation.¹¹ To receive an I-BPA award, the vendor must complete a technical evaluation of its equipment in the VIPR system. FS reviews vendor-submitted photographs and documents in the VIPR system to verify that the equipment meets minimum requirements.¹² The solicitation states that FS relies only on the vendor-provided information to determine whether the equipment meets the minimum requirements.¹³

The agency informed us that in FY 2023 five of eight regions conducted hands-on inspections, in addition to technical evaluations, to determine equipment eligibility for I-BPA awards.^{14 15} According to FAM staff, the regions used hands-on inspections to check for issues that they could not verify through the vendor-submitted photographs. We nonstatistically selected three regions for review. We found that two regions required both technical evaluations and hands-on inspections for certain types of equipment.¹⁶ This practice contradicted the solicitation terms by making hands-on inspections a prerequisite for I-BPA awards, creating an additional requirement not outlined in the solicitation and leading to inconsistent equipment evaluations across FS regions.

For example, in one region we found that two vendors passed the technical evaluation but were not awarded I-BPAs because they did not participate in a hands-on inspection of their equipment. In another region, a vendor did not receive a technical evaluation because the vendor did not

¹⁰ FS issued I-BPAs to eligible vendors to create a vendor pool and meet firefighting equipment needs.

¹¹ FAR §13.106-2(a)(2).

¹² FS awards I-BPAs based on three evaluation factors: (1) operational acceptability, (2) price reasonableness, and (3) past performance. The solicitation requires each resource to pass a technical evaluation before FS will consider the resource for an award. The technical evaluation determines whether the equipment meets operational acceptability standards.

¹³ As part of the technical evaluation, vendors submit specific images and documents to verify key details, such as the existence of the equipment, the presence of a Vehicle Identification Number or serial number, and the compliance with required specifications. The Government reviews this information to determine whether the equipment meets minimum requirements.

¹⁴ FS officials stated that one region, which covers Alaska, does not procure equipment through the VIPR system.

¹⁵ Hands-on inspections, also referred to as contract compliance inspections, are physical examinations conducted by FS regional staff to verify that equipment meets minimum requirements.

¹⁶ These two regions required hands-on inspections for certain types of heavy equipment. One region applied this requirement to all heavy equipment while the other conducted random inspections.

participate in a hands-on inspection.¹⁷ Regional FAM staff explained that time constraints in the award process made it challenging to conduct hands-on inspections after award issuance because post-award inspections could extend into fire season and delay resource availability.¹⁸ This inconsistency led to vendors facing different requirements depending on the region to which they applied.

The inconsistency occurred because FS lacked formal guidance to address the regions' equipment safety and operational concerns while ensuring compliance with the solicitation's requirement that operational acceptability be determined through the technical evaluation process. According to ESB, which is responsible for I-BPA procurement, regional FAM personnel have some autonomy in evaluating equipment; however, hands-on inspections should not influence the technical evaluation.¹⁹ While not formalized in guidance, ESB recommends that regions complete technical evaluations before hands-on inspections so that awards are issued quickly. If a region conducts a hands-on inspection after the technical evaluation and identifies an issue, the region should notify ESB to suspend the equipment from the I-BPA.

Without formal guidance requiring a consistent evaluation process, FS is at risk of vendor protests that could delay procurement. Federal procurement law allows vendors to challenge the award process if they believe an agency did not follow the solicitation criteria.²⁰ If a vendor protest succeeds, FS may have to change the solicitation or restart the solicitation process, which could delay procurement by weeks or months.²¹ Such a delay may cause FS to extend existing agreements or to issue an EERA—both of which may increase costs and administrative burdens.

Recommendation 1

Develop and implement formal guidance for conducting technical evaluations and hands-on inspections to ensure that awards are consistent and comply with solicitation requirements.

Agency Response

The Forest Service generally concurs with the recommendation and issued guidance that is responsive to the recommendation on April 4, 2025.

¹⁷ The third region we reviewed did not conduct hands-on inspections for new I-BPA awards in FY 2023. According to regional FAM staff, hands-on inspections conducted in FY 2023 were limited to equipment replacement and region moves, which involve modifying existing I-BPAs. These inspections are not part of the evaluation process for new I-BPA awards.

¹⁸ FAM and ESB worked together to complete the I-BPA procurement process in the VIPR system, which began in January and ended in June, when awards were published for FY 2023. For the three regions we reviewed, the fire season began in June 2023.

¹⁹ ESB officials stated that regions can update an exhibit within the solicitation to accommodate region-specific needs, such as hands-on inspections.

²⁰ Under FAR Subpart 33.1, vendors may file protests with the contracting agency or Government Accountability Office (GAO), among other venues.

²¹ A GAO protest could further extend delays because agencies may have to pause the award process while GAO reviews the protest. GAO has up to 100 days to issue a decision after a protest is filed.

OIG Position

We accept management decision for this recommendation.

Scope and Methodology

We conducted this inspection to assess FS' procurement and administration of preseason awards in FY 2023. During this period, according to FS, the agency ordered more than \$310 million in preseason firefighting equipment and other resources using I-BPAs. We conducted our fieldwork from May 2024 through February 2025 and visited the National Interagency Fire Center in Boise, Idaho in July 2024 (see Exhibit A). We discussed the results of our inspection with agency officials on March 20, 2025, and included their comments, as appropriate.

To accomplish our inspection objective, we:²²



Reviewed applicable regulations, agency policies, and procedures related to I-BPA preseason procurement.



Interviewed regional FAM staff to understand the rationale, timing, and process for conducting hands-on inspections.



Interviewed FAM and ESB officials to obtain an understanding of their roles and responsibilities in the acquisition process and oversight.



Analyzed FY 2023 VIPR system data to determine equipment categories, total dollar amounts spent, and spending distribution for I-BPA awards.



Reviewed select regions' technical evaluation and hands-on inspection records to assess their consistency with solicitation requirements.



Evaluated FAM's acquisition process to determine its adequacy.

To determine whether the regions had a consistent approach to conducting technical evaluations for I-BPA awards, we nonstatistically selected three of the eight regions for review. We selected two regions based on the highest dollar amounts for I-BPAs in FY 2023 and one region based on its association with our site visit.

We conducted this inspection in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*. These standards require that we plan and perform the inspection to obtain sufficient, appropriate evidence to provide a reasonable basis for our finding, conclusions, and recommendation based on our review objective. We believe that the evidence obtained provides a reasonable basis for our finding, conclusions, and recommendation based on our review.

²² We did not obtain a sample of I-BPAs for review for this inspection because the nature of the inspection was the planning and procurement process.

Abbreviations

DPL	Dispatch Priority List
EERA	Emergency Equipment Rental Agreement
ESB	Equipment and Services Branch
FAM	Fire and Aviation Management
FAR	Federal Acquisition Regulation
FS	Forest Service
FY	fiscal year
GAO	Government Accountability Office
I-BPA	Incident Blanket Purchase Agreement
OIG	Office of Inspector General
USDA	U.S. Department of Agriculture
VIPR	Virtual Incident Procurement

Exhibit A: Site Visited

Exhibit A summarizes the name and location of all sites visited.

Audit Site	Location
National Interagency Fire Center	Boise, Idaho

**Forest Service
Response to Inspection Report**

USDA Forest Service (FS)

Office of Inspector General (OIG) Inspection Report No. 08801-0004-41

Assessment of Forest Service's Preseason Procurement Awards

Response to the Official Draft Report

Recommendation 1: Develop and implement formal guidance for conducting technical evaluations and hands-on inspections to ensure that awards are consistent and comply with solicitation requirements.

FS Response: The Forest Service generally concurs with the recommendation and issued guidance that is responsive to the recommendation on April 4, 2025.

Estimated Completion Date: Completed

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