

Listing of all Firearms Reviewer Recommendations

Directives, Manuals and Operating Procedures (DMP)

- 1 WS Directive 2.615 WS Firearm Use and Safety
 - Trigger locks should be used when no safe, vault or cabinet is available for storage. Use of safeties is paramount to safe gun handling and should always be on when firearms are not in immediate use. (same as EFM-6)
 - Vehicles should be equipped with a rack or storage device that securely holds the firearm until it is ready for use. The rack should be of a design that allows for easy access and that allows the action to be locked open. Muzzle down floorboard racks are recommended. (same as EFM-7)
 - The Benelli shotguns in use by many of WS field employees cannot be locked to the rear while there are shells in the magazine so there is no way to visually tell that that a shell is not chambered. This is an unsafe practice, and should be addressed. (same as EFM-8)
 - The State Hunter Safety Course or other approved firearms safety-training course must include a live fire segment. A dated copy of this certificate should be required and retained in personnel files. It should not be deemed acceptable to waive WS firearm safety training for any reason. All new employees should not be issued firearms until they have completed WS Firearm Safety Training. (same as TP-13)
 - Firearm and Pyrotechnics training should be separate, and taught free of the distractions and limitations encountered during a “State Meeting”. Curriculum from a nationally recognized organization should be implemented with the addition of other pertinent State firearms training information such as the inclusion of Federal, State and Local Firearm Laws and other relevant training. Live fire should be mandatory. (Same as TP-14)
 - Directives should be as specific as possible when addressing firearm safety issues especially when involving firearms in a vehicle. Reducing confusion by exacting specific procedure will help to insure safe gun handling in and out of vehicles.
 - All employees that use firearms should be drug tested prior to employment. In addition, if a firearms related incident/accident occurs, drug testing should be mandatory.
- 2 WS Directive 2.625 Pyrotechnics, Rocket Net Charges, and Incidental Explosive Materials
 - Pyrotechnic training needs to be part of the Firearms Training Program conducted on an annual basis. Training should take place prior to using in the field. (same as TP-15)
 - Pyrotechnic ammo should be carried in IME-22 containers as required in the directive. (same as TP-16)
 - Fire extinguishers should be tested on an annual basis to assure workability. (same as EFM-9)
- 3 Directives should clearly address shooting firearms and pyrotechnics out of vehicles.

- 4 WS Directives should clearly address whether shooting out of vehicles is allowed. Additionally, directives should clearly address what is defined as “out of vehicles” e.g. muzzle out window, person completely out of vehicle. If shooting out of vehicle is indicated, a procedure for transporting the firearm while in pursuit of wildlife should be clearly addressed.
- 5 The SOP’s and Guidelines need to remove some the ambiguity from firearm safety issues. Some of these issues are “shooting from a vehicle”, “when a firearm is considered safe or unloaded”, “safest way to transport”, “storing pyrotechnics in the same container as primers (ignition source)”, etc.
- 6 Revise the SF 182, or devise a different form altogether, to make it less time consuming to fill out.

Management and Administration (MA)

- 1 The Firearm Safety Committee should be tasked with devising a system to track all firearm related accidents, incidents and safety violations, regardless of whether injury or property damage has occurred. A toll free anonymous hotline should be instituted in addition to other reporting mechanisms. The committee should develop an investigative process to respond to reports of unsafe firearm situations. Guidelines should be developed for stricter disciplinary action regarding firearm accidents/incidents to include mandatory drug testing and retraining.
- 2 Adopt the easy 3 NRA Firearm Safety rules to prevent confusion and simplify:
1. Always point the gun in a safe direction. 2. Keep finger off the trigger until ready to use. 3. Keep the gun unloaded until ready to use. Provide specific procedures (removing latitude) for firearm safety issues such as the safest way to transport a firearm when use is imminent.
- 3 Corrective Action relative to firearm safety incidents should be perceived with greater importance not just by the person(s) involved directly in the incident but also by all of the employees in the State. It should be viewed that any incident affects the reputation of the entire State, all of its employees and the entire Agency.
- 4 Provide direction and funding for the Firearms Committee. Establish an information sharing process. This could be as simple as providing a list of firearms trainers’ phone numbers or starting a forum strictly used for exchanging ideas.
- 5 Supervisors and State Directors should attempt to “ride along” with each field employee at least annually. (same as C-6)
- 6 If a Coordinator is appointed to make recommendations for safety improvements then State Directors and Supervisors should try to implement the recommendations, to the extent that they are reasonable and cost effective, otherwise the program is ineffective. (same as SS-1)
- 7 Wildlife Services employees must adhere to all of the basic rules of firearms safety. In addition to following these rules, it must become second nature for employees to utilize the safeties on their firearms.

Training Program (TP)

- 1 Wildlife Services firearm safety training should be standardized. The NRA is the only Nationally recognized Firearm Safety Training organization. WS should adopt the use of NRA certified instructors, use of NRA curriculum (to include their 3 fundamental safety rules) and certification for pistol, rifle, and shotgun, NRA proficiency standards, NRA testing, and NRA certification for WS employees. Additional state related firearm safety training may be added such as information regarding concealed carry laws.
- 2 Firearms safety materials and training should be uniform for all Wildlife Services employees, regardless of where the training takes place. The only way to ensure this, would be to make the WS Firearm Safety Training Manual more comprehensive, create a stand alone Firearms Safety Training Lesson Plan, or to utilize the materials already in place by a nationally recognized institution (e.g. the NRA) with the addition of materials relevant to Wildlife Services (such as pyrotechnic use, shooting from vehicles, dispatching wildlife in traps etc.).
- 3 Provided that employees initially complete basic rifle, pistol, and shotgun training (e.g NRA Basic Rifle, Shotgun, Pistol courses); training should be required for recertification on an annual basis with the abridged lesson plans such as the NRA First Steps Rifle, Pistol, Shotgun. All field employees that use any type of firearm should be required to meet a proficiency level or qualification. Documentation of this should be retained in the employee's file. Employees should not be issued any firearm for which they cannot attain minimum proficiency.
- 4 Require training and recertification on an annual basis. New employees should not be issued firearms until they have completed a firearms training program (this could even be arranged through an NRA Instructor outside of the agency). This is more important than has been in the past because of the diminished skill level of applicants. Require a minimum proficiency shooting level for shotgun, rifle and handgun. These firearms should only be issued to those that meet or exceed the minimum proficiency levels.
- 5 Control of firing line should include the use of loud, consistent commands.
- 6 The State Hunter Safety Course or other approved firearms safety-training course must include a live fire segment. A dated copy of this certificate should be required and retained in personnel files. It should not be deemed acceptable to waive WS firearm safety training for any reason. All new employees should not be issued firearms until they have completed WS Firearm Safety Training. (same as DMP-1)
- 7 Firearm and Pyrotechnics training should be separate, and taught free of the distractions and limitations encountered during a "State Meeting". Curriculum from a nationally recognized organization should be implemented with the addition of other pertinent State firearms training information such as the inclusion of Federal, State and Local Firearm Laws and other relevant training. Live fire should be mandatory. (same as DMP-1)
- 8 Pyrotechnic training needs to be part of the Firearms Training Program conducted on an annual basis. Training should take place prior to using in the field. (same as DPM-2)

- 9 Pyrotechnic ammo should be carried in IME-22 containers as required in the directive. (same as DPM-2)

Additional Safety Staff (SS)

- 1 If a Coordinator is appointed to make recommendations for safety improvements then State Directors and Supervisors should try to implement the recommendations, to the extent that they are reasonable and cost effective, otherwise the program is ineffective. (same as MA-7)

Equipment, Facilities and Maintenance (EFM)

- 1 All firearms that are used in WS job capacity should be inspected annually. All work performed on these firearms should be initially approved by the State Director and the work should be conducted only by a certified gunsmith. Firearms should be inspected periodically to ensure proper functioning of actions and safeties.
- 2 Firearms used in the performance of Wildlife Services duties should not be modified without the approval of the State Director. Any modifications must be made by a certified gunsmith.
- 3 Inspection of all firearms should be conducted at least annually.
- 4 Firearms should be transported in vehicles in an approved rack system or hard sided case. When use is not imminent the bolt should be locked to the rear, magazines removed or empty and safeties on.
- 5 Trigger locks should be used when no safe, vault or cabinet is available for storage. Use of safeties is paramount to safe gun handling and should always be on when firearms are not in immediate use. (same as DMP-1)
- 6 Vehicles should be equipped with a rack or storage device that securely holds the firearm until it is ready for use. The rack should be of a design that allows for easy access and that allows the action to be locked open. Muzzle down floorboard racks are recommended. (same as DMP-1)
- 7 The Benelli shotguns in use by many of WS field employees cannot be locked to the rear while there are shells in the magazine so there is no way to visually tell that that a shell is not chambered. This is an unsafe practice, and should be addressed. (same as DMP-1)
- 8 Fire extinguishers should be tested on an annual basis to assure workability. (same as DMP-2)

Databases and Tracking Systems (DB)

- 1 Devise a tracking system for these incidents that fall outside of the damage to person or property guidelines. This could be accomplished with an 800-phone number to report firearm safety violations. The firearms committee would then decide whether an investigation or inquiry is needed and proceed accordingly. In addition, a tracking system may help to identify trends as well as inherently faulty equipment.

Culture (C)

- 1 The award program should be better defined to address the criteria to be nominated and what the award means for the recipients. It may also be beneficial for a specific firearm safety award to be instituted. Safety and Health Council Coordinators recommendations should be given weight.
- 2 As the responsibilities of supervisors and State Directors grow, they need to be careful not to allow their focus regarding firearm safety to shift or become diminished.
- 3 Provide direction and funding for the Firearms Committee. Establish an information sharing process. This could be as simple as providing a list of Firearms Trainers' phone numbers or starting a forum strictly used for exchanging ideas.
- 4 States should develop a sharing information system relative to firearm incidents. While some States may be reluctant to share such information the benefit far outweighs any of the negatives associated with having an accident or incident. Perhaps the Firearms Safety Committee could facilitate this. (same as MA-4)
- 5 Display firearm safety posters and other visual safety information to reinforce safety on bulletin boards, safes and in vehicles both in the State and Field offices.
- 6 Supervisors and State Directors should attempt to "ride along" with each field employee at least annually. (same as MA-6)