

**Dragon, Karen E. (CDC/NIOSH/EID)**

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**From:** Housewright, Meghan [MHousewright@nfpa.org]  
**Sent:** Friday, July 29, 2011 10:48 AM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** 063-B - Stakeholder Comment on the National Institute for Occupational Safety and Health (NIOSH) Fire Fighter Fatality Investigation and Prevention Program (FFFIPP)-2011  
**Attachments:** NFPA comments Docket No NIOSH 063B.pdf; NFPA comments Docket No NIOSH 063B.docx

Dear Sir or Madam:

Attached is NFPA's comments on the NIOSH Fire Fighter Fatality Investigation and Prevention Program.

Thank you for the opportunity to comment.

Sincerely,  
Meghan Housewright

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July 29, 2011

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Robert A. Taft Laboratories  
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4676 Columbia Parkway  
Cincinnati OH 45226

Ref: Docket Number NIOSH-063B

To Whom It May Concern:

Thank you for the opportunity to comment on NIOSH's Fire Fighter Fatality Investigation and Prevention Program (FFFIPP).

NIOSH has requested input from stakeholders in several specific areas:

- FFFIPP priorities for conducting investigations

Fatality investigations should continue to be the focus of the FFFIPP. It is unfortunate that NIOSH has never been allocated sufficient funding to investigate all on-duty fatalities. NIOSH investigations document, in a standard format, the reasons for each fatality and recommendations that will help other fire departments prevent similar occurrences. The reports can be used by fire departments to evaluate the adequacy of their own health and safety programs, and for prioritizing and focusing training efforts.

Goal A.2 of NIOSH's strategic plan calls for 90 percent of investigations to involve deaths related to CVD, structure fires and motor vehicle incidents. This matches up very well with the distribution of on-duty fatalities over the past five years (2006-2010) – 87% of the on-duty fatalities were due to sudden cardiac death, other medical causes, motor vehicle crashes, struck by vehicles, and traumatic deaths at structure fires (not related to motor vehicles).

- changes to the format of FFFIPP investigation reports

The format and content changes to the FFFIPP investigation reports have been extremely helpful. The executive summary provides a succinct outline of the circumstances surrounding each fatality and highlights the findings. The clear identification of the contributing factors increases the utility of the reports.

NFPA staff is pleased to have the opportunity to provide assistance during the draft review stage of report preparation. This allows NFPA to provide input on the applicable NFPA

codes and standards in the report, and also helps to identify fatality reports that should be forwarded to the relevant NFPA technical committees when completed.

The recommendations listed in the NIOSH Alert Bulletins and firefighter fatality reports often refer to NFPA standards. We would like to point out that NFPA now makes all of its codes and standards available for viewing, free of charge. Directing their readers to this resource could make the NIOSH reports even more valuable to their constituency ([http://www.nfpa.org/aboutthecodes/list\\_of\\_codes\\_and\\_standards.asp](http://www.nfpa.org/aboutthecodes/list_of_codes_and_standards.asp)).

- changes to the FFFIPP website

The FFFIPP website is extremely useful for quickly accessing completed reports. The search capability functions quite well. The inclusion of pending investigations has been an excellent addition to the website, since a user can now readily identify which fatal incidents have and have not been investigated. While enhancements could probably be made by a web publishing consultant, that work is not essential during this time of budgetary constraints. It is important to preserve, as much as possible, the ability to conduct on-scene investigations.

- suggestions for program improvements to increase the impact on firefighter safety and health

Given the budgetary constraints, it is not likely that NIOSH can extend its programs in other areas that could help impact firefighter health and safety. However, when possible, it would be great if NIOSH could look at injuries, given that the number of on-duty firefighter fatalities is decreasing. NFPA estimates that approximately 78,000 firefighter injuries occurred in 2009. About two-fifths of these were on the fire ground. Approximately 2,300 were due to burns, 2,000 to smoke or gas inhalation and 445 to a combination of burns and smoke inhalation. In addition, more than 1,100 firefighters are stricken by non-fatal heart attacks and strokes annually while on duty. Clearly, there are a vast number of injuries each year that might be prevented if the fire service knew more about how they occur and steps they can take to prevent them. The focus should be on the severe injuries.

Epidemiological studies of deaths and injuries, based on NIOSH investigations and any other available data, would have great value and NIOSH would seem to be the ideal agency to conduct those studies. These studies could address questions concerning cancer rates among in the fire service as compared to other occupations; illness rates resulting from long-term exposures, etc. Some data from workers compensation programs might be used to study patterns in firefighter injury and illness, as well as the other data sources mentioned.

- examples of how FFFIPP investigation reports and products are used by fire service organizations, fire departments and firefighters, and fire service safety and health researchers

NFPA makes use of the NIOSH FFFIPP output in three main areas: 1) our own annual firefighter fatality study; 2) our standards development work; and 3) in our handling of data requests related to the fire service.

For the firefighter fatality study, we find the thorough reporting of the circumstances surrounding each fatality to be invaluable. Details included in the investigation reports are often not available from other sources. The clear, relevant recommendations for each incident and the consistent reporting format make the investigations extremely useful in our efforts. With this information, we are able to develop a more accurate database, allowing us to better identify overall trends.

NFPA's technical committees are constantly reviewing their codes or standards to determine if the existing requirements are working or whether new requirements should be added. Such decisions are made using the best available information which sometimes is less than complete. The firefighter fatality investigation program has provided both detailed information for technical committees to use and technical staff who are involved with the program to participate as members of the technical committees to help interpret the information and develop the standards language needed to address the problems. NIOSH's investigation program directly impacts NFPA 1001, 1021, 1500, 1521, 1561, 1581, 1582, 1584, 1620, 1710, 1720, 1901, 1977, 1981 and 1982.

At NFPA, we are frequently asked questions about firefighter deaths and injuries, which we answer with a combination of statistics over a range of years and specific examples. We have national statistics available through other sources. The NIOSH reports provide excellent details and specific recommendations that the requesting fire department can then incorporate into their training programs and operating procedures. The anecdotal material is used to flesh out the statistics, and we often provide links to the NIOSH FFFIPP reports along with the trend data related to the question.

- ways in which the FFFIPP can document its impact on firefighter safety and health

It is unrealistic to expect that the NIOSH fatality investigation program could be shown to have directly reduced the U.S. firefighter fatality problem. Each year, of the estimated 1.15 million career and volunteer firefighters in this country, approximately 82 are killed while on-duty. Of those 82 firefighters, approximately 67 die of fatal injuries suffered while dealing with emergency incidents. The trauma investigations have great value in clearly showing how fatal injuries occurred and make excellent training tools for fire departments, but directly translating the investigation findings into changes in culture or behavior is beyond the role of NIOSH. The fire service leadership and members of the fire service must assume that role and focus on the results of the investigations.

Participating in a process such as the NFPA standards-making system is another way that NIOSH staff can impact the way the fire service benefits from the fire investigations. NIOSH staff are often the most familiar with the circumstances of the fatality and can suggest specific changes to the safety and health standards that are used to regulate processes and procedures that could prevent future reoccurrences. Fatalities due to sudden cardiac death, which make up almost half of the emergency-duty-related deaths of career and volunteer firefighter deaths, are largely due to risk factors that take decades to develop and substantial time to address (weight, cholesterol, hypertension, etc.).

We suggest that NIOSH establish a web-based conference board where firefighters could post comments, discuss changes they made to their SOPs based on the lessons learned, or other information for the "good of the order." This would give NIOSH feedback on their investigation program and would also encourage fire departments to incorporate the findings into their training and procedures.

In conclusion, we would like to note that NIOSH staff participation in the NFPA codes and standards process is extremely valuable. Distilling the findings from the investigations into suggested changes to codes and standards is possibly the most direct way that NIOSH can effect a reduction in firefighter deaths and injuries. It would be extremely unfortunate if budget constraints make that participation impossible.

Again, we would like to thank you for the opportunity to provide these comments.

Sincerely,

Gregory Cade  
Director, Government Affairs

cc: K. Willette  
R. Fahy