

Miller, Diane M. (CDC/NIOSH/EID)

From: Lucian Deaton [LDeaton@iafc.org]
Sent: Friday, December 19, 2008 3:24 PM
To: NIOSH Docket Office (CDC)
Cc: Moore, Paul H. (CDC/NIOSH/DSR)
Subject: IAFC Written Comments for FFFIPP Nov 19 2008 Stakeholders Meeting
Attachments: IAFC written comments for FFFIPP 111908 stakeholders meeting 121908.pdf

Please find attached the written comments of the IAFC. It is our procedure to only send formal signed letters via PDF. Please let me know if this will be a problem with submission.

Lucian

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December 19, 2008

Ms. Christine Branche
Acting Director
National Institute for Occupational Safety and Health (NIOSH)
NIOSH Docket Office
Robert A. Taft Laboratories, M/S C34
4676 Columbia Parkway
Cincinnati, OH 45226

SENT VIA EMAIL: niocindocket@cdc.gov

Reference: Docket Number NIOSH-063-A

Dear Acting Director Branche:

On behalf of the nearly 13,000 chief fire and emergency officers of the International Association of Fire Chiefs (IAFC), I would like to thank you for the opportunity to comment on the progress and strategic goals of the Fire Fighter Fatality Investigation and Prevention Program (FFFIPP). These written comments are based upon the oral presentations given by Chief David B. Fulmer, CFO, Miami Township Division of Fire & EMS, Ohio, and me at the November 19, 2008, NIOSH Stakeholders meeting held in Rosemont, Illinois.

The IAFC strongly believes that the FFFIPP should receive the financial resources necessary to fully implement its mission of ensuring that the most is learned from each fire fighter fatality. The program is able to investigate only 30 to 40 percent of the fatalities in a given year. While the budget for the program is approximately \$2 million annually, the level of funding has not mirrored its level of ability and impact. According to a 2007 report by the Inspector General of the U.S. Department of Health and Human Services, such shortcomings are caused by a lack of resources. These resources should be at its disposal to investigate all line-of-duty deaths. Its reports should be comprehensive, continuing the tradition of sound science and in depth research that the FFFIPP has strived for. The FFFIPP also should continue to maintain the positive and constructive relationship between the federal investigation program, state and local authorities, and local departments.

Since its inception in 1998, the FFFIPP has handled over 400 investigations, which have been of strong value to the fire service. FFFIPP reports have been used to properly show medical and situational facts that have helped surviving families receive support from the US Department of Justice's Public Safety Officers Benefits program. The work of the FFFIPP also has led to

countless improvements in protocol, training programs, SCBA performance, personal protective equipment (PPE) performance, revisions to NFPA standards, and most of all, the saving of firefighter's lives.

The role of the FFFIPP is necessary, because the number of firefighter fatalities is too high. In fact the United States has, on an annual basis, between 2 and 3 times as many firefighter fatalities as the rest of the world combined. This is not the kind of leadership that our great country should have. According to the most recent numbers compiled by the U.S. Fire Administration, the fire service has witnessed 102 line-of-duty deaths thus far in 2008. In 2007, this unfortunate count reached 117. The IAFC appreciates the level of seriousness and respect that the FFFIPP brings to their investigations and in their work with those affected by tragic loss. While 102 firefighters have died serving their communities in 2008, countless widows, family members, colleagues, neighbors and friends remain.

The NIOSH also has worked closely with fire service groups leading to improvements in standards for equipment such as PASS devices. In five investigations prior to 2003, where PASS devices were reported not to have been heard, NIOSH documented those findings in reports that were sent out to all fire departments and associations leading to life saving improvements. With all the work that the FFFIP program provides, it is important for the fire service to assist in reducing the number of line-of-duty deaths. While we value the work of the FFFIP program and seek support for their expansion, it is important for the fire service not to see it as a substitute for aggressive prevention efforts. Fire departments must work to not only take the lessons of FFFIP investigation reports to heart, but also use them as a proper tool in reducing future incidents. This should not only occur on the fire scene or during fire suppression, but in personnel fitness, wearing seatbelts en route, and proper training techniques.

The IAFC tasked its Safety, Health and Survival (SHS) Section to work collaboratively with other fire service groups in the creation of recommendations for improvements to the program. These were presented to the NIOSH in 2007 and were productively received by the FFFIPP. These recommendations included the development of an advisory board – comprised of experts in the fire service – to represent fire interests; the development of a working group to assist the information gathering for FFFIPP reports; and the identification of statutory changes to facilitate the mission of the FFFIPP. The report also recommended focus on the integration of fire service subject-matter experts in the FFFIPP investigative process; development of written criteria to identify fire incidents of added research interest; and the adoption of funding for these reports. Also, implementation of an expanded investigation program is suggested, along with the development of a program to study PPE failures and the enhancement of technical evaluations and testing for PPE involved in firefighter fatalities. The IAFC SHS Section's June 4, 2007, FFFIPP recommendations report is available online at www.iafc.org/SHS.

While some recommendations have been acted upon, others remain open due to funding needs by the agency to complete them. The FFFIPP should receive the financial resources necessary to fully implement its mission of ensuring that the most is learned from each fire fighter fatality.

On average, the fire service witnesses over 100 line-of-duty deaths per year and this is over 100 too many. NIOSH and the FFFIPP have and will play an important role in providing lessons that

will reduce these fatalities. The IAFC is grateful for the opportunity to take part in the development of the strategic direction of this program, and is committed to working with the FFFIPP to ensure its successful future.

Sincerely,

A handwritten signature in black ink that reads "Larry J. Grorud". The signature is written in a cursive style with a large, prominent "L" and "G".

Chief Larry J. Grorud, CFO, MIFireE
President