NFPA Technical Committee on Deployment and Organization of Fire Prevention Activities

MEETING AGENDA
San Antonio, TX
November 19-20, 2013

1. Chair Farr calls meeting to order on November 19, 2013 at 8:00 am.

2. Introduction of attendees.

3. Approval of the minutes of the October 29-31, 2012 San Diego, CA meeting, December 18, 2012 Live Meeting and January 17, 2013 Live meeting (Attachment A).

4. Review purpose of meeting and document schedule (Attachment B).

5. Review public inputs and develop first revisions (Attachment C).

6. Old business.


8. Date and location of next meeting.

The meeting was called to order by Chair Farr on October 29, 2012 at 12:00 pm.

Introduction of Attendees

Members Present:
Ronald Farr, UL, MI, Chair
Steven Sawyer, NFPA Staff Liaison
William Bowman, Louisville Fire & Rescue, KY
Lisa Cockerill, City of Burlington FD, Canada
James Dawson, Chesterfield County Fire & EMS, VA
Brett Lacey, IFSTA, CO
Frank Lamie, Canadian Association of Fire Chiefs, ON
Michael Larabel, Amway Inc., MI
Paul Martin, NY State Office of Fire Prevention & Control, NY
Randy Minaker, Port Coquitlam, BC
Laura Mueller, National League of Cities, TX
Kellie Sawyers, Oklahoma City FD, OK
Lynn Schofield, NFPA Ed Section, UT
Art Shaw, NAT&T, MI
Larry Willhite, Palm Beach County Fire Rescue, FL
Morgana Yahnke, CA Fire Chiefs Association, CA
George Apple, Alternate, CA Fire Chiefs Association, CA
Connie Forster, Alternate, IAFC, MN
Jim Jessop, Alternate, Canadian AFC, Ontario, Canada
Timothy Kerbrat, Alternate, IAFC, CA
Catherine Spain, Alternate, National League of Cities, DC
John Verbeek, Alternate, Urban Fire Safety Task Force, ON

Guests Present:
Tonya Hoover, CA State Fire Marshal, CA

Members not present:
Michael Bodnar, Sereca Fire Consulting LTD, Alberta
Timothy Bradley, NASFM, NC
Frederick Brower, ISO, MD
Richard Brown, ICMA, MA
Gregory Chesser, US Department of the Air Force, WY
Joseph Davis, Town of Troy FD, NC
Bruce Faust, Washington DC Fire & EMS, DC
Brian McQueen, NVFC, NY
James Munger, James Munger & Associates, Inc., AL
Ryan O'Donnell, FEMA, NY
Eugene Pietzak, IAAI, NY
Guy Santelli, WI Fire Inspectors Association, WI
Derrick Sawyer, NFPA’s Urban Fire Safety Task Force, PA
Gary Styers, IAFC, NC
Hugh Gibson, Alternate, ISO, NJ
Robert James, Alternate, UL, FL
Thomas Rossi, Alternate, FEMA, NY
Thomas Wieczorek, Voting Alternate, ICMA, DC

Motion made, seconded and accepted to approve the minutes of May 16-17, 2012 Niagara Falls, Ontario meeting.

CA State Fire Marshal Tonya Hoover welcomed the committee.

Chair Farr and Staff Liaison Sawyer make opening remarks and reviewed the purpose of meeting.

The task groups met and the committee reviewed language in the draft document.

Old business.
   None.

New business.
   None.

The next meeting will be held on September 16-18, 2013 in Lansing, MI.

The meeting adjourned on October 31, 2012 at 2:00 pm.

Respectfully Submitted,

Steven F. Sawyer
Staff Liaison
The meeting was called to order by Chair Farr on December 18, 2012 at 12:00 pm.

Introduction of Attendees

Members Present:
Ronald Farr, UL, MI, Chair
Steven Sawyer, NFPA Staff Liaison
William Bowman, Louisville Fire & Rescue, KY
Richard Brown, ICMA, MA
James Dawson, Chesterfield County Fire & EMS, VA
Bruce Faust, Washington DC Fire & EMS, DC
Brett Lacey, IFSTA, CO
Frank Lamie, Canadian Association of Fire Chiefs, ON
Brian McQueen, NVFC, NY
James Munger, James Munger & Associates, Inc., AL
Derrick Sawyer, NFPA's Urban Fire Safety Task Force, PA
Art Shaw, NAT&T, MI
Gary Styers, IAFC, NC
Larry Willhite, Palm Beach County Fire Rescue, FL
Morgana Yahnke, CA Fire Chiefs Association, CA
George Apple, Alternate, CA Fire Chiefs Association, CA
Connie Forster, Alternate, IAFC, MN
Hugh Gibson, Alternate, ISO, NJ
Timothy Kerbrat, Alternate, IAFC, CA
Tim Knisely, Alternate, NY State Office of Fire Prevention & Control,
Catherine Spain, Alternate, National League of Cities, DC
John Verbeek, Alternate, Urban Fire Safety Task Force, ON

Guests Present:
None

Members not present:
Michael Bodnar, Sereca Fire Consulting LTD, Alberta
Frederick Brower, ISO, MD
Gregory Chesser, US Department of the Air Force, WY
Lisa Cockerill, City of Burlington FD, Canada
Chair Farr and Staff Liaison Sawyer make opening remarks and reviewed the purpose of meeting.

The committee reviewed the text in Chapter 1-4, 6-9 and Annex C.

Old business.
None.

New business.
None.

The next meeting conference call will be held on January 17, 2013 at 12:00 pm ET.

The meeting adjourned on December 18, 2012 at 1:35 pm.

Respectfully Submitted,

Steven F. Sawyer
Staff Liaison
The meeting was called to order by Chair Farr on January 17, 2013 at 12:00 pm.

Introduction of Attendees

Members Present:
Ronald Farr, UL, MI, Chair
Steven Sawyer, NFPA Staff Liaison
William Bowman, Louisville Fire & Rescue, KY
Richard Brown, ICMA, MA
Gregory Chesser, US Department of the Air Force, WY
James Dawson, Chesterfield County Fire & EMS, VA
Bruce Faust, Washington DC Fire & EMS, DC
Michael Larabel, Amway Inc., MI
Randy Minaker, Port Coquitlam, BC
Laura Mueller, National League of Cities, TX
Art Shaw, NAT&T, MI
Gary Styers, IAFC, NC
Kellie Sawyers, Oklahoma City FD, OK
Larry Willhite, Palm Beach County Fire Rescue, FL
Morgana Yahnke, CA Fire Chiefs Association, CA
George Apple, Alternate, CA Fire Chiefs Association, CA
Connie Forster, Alternate, IAFC, MN
Hugh Gibson, Alternate, ISO, NJ
Jim Jessop, Alternate, Canadian AFC, Ontario, Canada
Timothy Kerbrat, Alternate, IAFC, CA
Catherine Spain, Alternate, National League of Cities, DC
John Verbeek, Alternate, Urban Fire Safety Task Force, ON

Guests Present:
None

Members not present:
Michael Bodnar, Serea Fire Consulting LTD, Alberta
Frederick Brower, ISO, MD
Lisa Cockerill, City of Burlington FD, Canada
Joseph Davis, Town of Troy FD, NC
The committee reviewed the text in Chapter 5 and Annex B.

Old business.
   None.

New business.
   Motion made, seconded and approved to ask the standards council to release the draft for public input and enter into the Annual 2015 cycle.

The meeting adjourned on January 17, 2013 at 1:25 pm.

Respectfully Submitted,

Steven F. Sawyer
Staff Liaison
ATTACHMENT B
# 2015 ANNUAL REVISION CYCLE

*Public Input Dates may vary according to standards and schedules for Revision Cycles may change. Please check the NFPA Website for the most up-to-date information on Public Input Closing Dates and schedules at www.nfpa.org/document # (i.e. www.nfpa.org/101) and click on the Next Edition tab.

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Approved  October 18, 2011  Revised  March 7, 2013
ATTACHMENT C
Change the title of the document as follows: NFPA 1730: Standard on Organization and Deployment of Fire Prevention Programs and Activities, Inspection and Code Enforcement, Plan Review, Investigation, and Public Education Operations to the Public

Statement of Problem and Substantiation for Public Input

The current title is too long and unnecessarily complicated. The details of what constitute fire prevention activities are listed as a part of the scope. The title does not need to reflect exactly what is codified in the body of the document's scope. This revision simplifies the title and makes it clear what the document is about. The title is not enforceable, it is a title and should be clear to understand.

Submitter Information Verification

Submitter Full Name: Paul Haake
Organization: Maui Fire Department
Affiliation: Hawaii State Fire Council, Fire Prevention Committee
Street Address:
City:
State:
Zip:
Submittal Date: Mon Sep 09 11:56:58 EDT 2013

Copyright Assignment

I, Paul Haake, hereby irrevocably grant and assign to the National Fire Protection Association (NFPA) all and full rights in copyright in this Public Input (including both the Proposed Change and the Statement of Problem and Substantiation). I understand and intend that I acquire no rights, including rights as a joint author, in any publication of the NFPA in which this Public Input in this or another similar or derivative form is used. I hereby warrant that I am the author of this Public Input and that I have full power and authority to enter into this copyright assignment.

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No original or new content was specified

Statement of Problem and Substantiation for Public Input

Submitter Information Verification

This PI has not been submitted yet

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1.1.4
This standard addresses the strategic and policy issues involving the organization and deployment of a fire prevention program and does not address methods for carrying out specific fire prevention services, activities, and programs.

Statement of Problem and Substantiation for Public Input
The word "activities" is added to reflect the proposed change to the title. The rest of the sentence is proposed for deletion because it is not necessary to say what the standard does not cover.

Related Public Inputs for This Document

<table>
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<tr>
<td>Public Input No. 69-NFPA 1730-2013 [Global Input]</td>
<td>similar changes, but not dependent.</td>
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Submitter Information Verification
Submitter Full Name: Paul Haake
Organization: Maui Fire Department
Affiliation: Hawaii State Fire Council, Fire Prevention Committee
Street Address: City:
State:
Zip: Submittal Date: Mon Sep 09 12:01:56 EDT 2013

Copyright Assignment
I, Paul Haake, hereby irrevocably grant and assign to the National Fire Protection Association (NFPA) all and full rights in copyright in this Public Input (including both the Proposed Change and the Statement of Problem and Substantiation). I understand and intend that I acquire no rights, including rights as a joint author, in any publication of the NFPA in which this Public Input in this or another similar or derivative form is used. I hereby warrant that I am the author of this Public Input and that I have full power and authority to enter into this copyright assignment.

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1.2.1 The purpose of this standard is to specify the minimum criteria addressing the effectiveness and efficiency of the public FPO functions of fire prevention inspection and code enforcement, plan review, investigation, and public education operations to the public by fire departments and other organization.

Statement of Problem and Substantiation for Public Input

This standard was developed to apply to all FPO organizations both public and private. Eliminating the "public" designation preceding FPO in this section makes that intent clear and in conformance with the final statement dealing with "other organizations" in this paragraph.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member, 1730 TC
Street Address:
City:
State:
Zip:
Submittal Date: Fri Apr 26 15:19:10 EDT 2013

Copyright Assignment

I, James Dawson, hereby irrevocably grant and assign to the National Fire Protection Association (NFPA) all and full rights in copyright in this Public Input (including both the Proposed Change and the Statement of Problem and Substantiation). I understand and intend that I acquire no rights, including rights as a joint author, in any publication of the NFPA in which this Public Input in this or another similar or derivative form is used. I hereby warrant that I am the author of this Public Input and that I have full power and authority to enter into this copyright assignment.

By checking this box I affirm that I am James Dawson, and I agree to be legally bound by the above Copyright Assignment and the terms and conditions contained therein. I understand and intend that, by checking this box, I am creating an electronic signature that will, upon my submission of this form, have the same legal force and effect as a handwritten signature.
3.3.x Fire Prevention Organization (FPO). The governmental jurisdiction having authority to provide fire prevention, inspection and code enforcement, plan review, fire origin and cause investigation and fire and life safety education operations to the public.

Statement of Problem and Substantiation for Public Input

A definition would reduce confusion with the use of the acronym "FPO" throughout the standard. While a user may infer the definition from the scoping sections, a clearly articulated definition ensures the correct understanding of the use of FPO throughout the text of the standard.

Submitter Information Verification

Submitter Full Name: FULTON COCHRAN
Organization: HENDERSON CITY OF
Affiliation: ICC Fire Service Membership Council Governing Committee
Street Address:
City: 
State: 
Zip:
Submittal Date: Tue Sep 10 09:10:18 EDT 2013

Copyright Assignment

I, FULTON COCHRAN, hereby irrevocably grant and assign to the National Fire Protection Association (NFPA) all and full rights in copyright in this Public Input (including both the Proposed Change and the Statement of Problem and Substantiation). I understand and intend that I acquire no rights, including rights as a joint author, in any publication of the NFPA in which this Public Input is this or another similar or derivative form is used. I hereby warrant that I am the author of this Public Input and that I have full power and authority to enter into this copyright assignment.

By checking this box I affirm that I am FULTON COCHRAN, and I agree to be legally bound by the above Copyright Assignment and the terms and conditions contained therein. I understand and intend that, by checking this box, I am creating an electronic signature that will, upon my submission of this form, have the same legal force and effect as a handwritten signature.
### High-Risk Occupancy

An occupancy that has a history of (1) high frequency of fires, or (2) high potential for loss of life, or (3) high potential for economic loss or that has a low or moderate history of fires or loss of life but the occupants have a high dependency on the built-in fire protection features or staff to assist evacuation in a fire or other emergency. 

### Statement of Problem and Substantiation for Public Input

Item 3 seems redundant to items 1 & 2. This seems to really describe what a high potential for life loss might be. Suggest that the technical committee consider that the text of item 3 be relocated to the Annex A section to describe this scenario as a high risk.

### Submitter Information Verification

**Submitter Full Name:** Paul Haake  
**Organization:** Maui Fire Department  
**Affiliation:** Hawaii State Fire Council, Fire Prevention Committee  
**Street Address:**  
**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Mon Sep 09 12:06:26 EDT 2013

### Copyright Assignment

I, Paul Haake, hereby irrevocably grant and assign to the National Fire Protection Association (NFPA) all and full rights in copyright in this Public Input (including both the Proposed Change and the Statement of Problem and Substantiation). I understand and intend that I acquire no rights, including rights as a joint author, in any publication of the NFPA in which this Public Input in this or another similar or derivative form is used. I hereby warrant that I am the author of this Public Input and that I have full power and authority to enter into this copyright assignment.

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4.1 Fire Prevention Organization: Organizational Statement.

4.1.1 The authority having jurisdiction (AHJ) shall maintain a written statement or policy that establishes the following:

1. Existence of the FPO
2. Services that the FPO will provide
3. Basic organizational structure
4. Expected number of FPO members
5. Functions that FPO members are expected to perform

4.1.2 The FPO organizational statement shall provide service delivery objectives, including specific objectives for each major service component (e.g., fire prevention inspection and code enforcement, plan review, investigation, and public education).

Statement of Problem and Substantiation for Public Input

The proposed revision to the title of section 4.1 is editorial. Currently the section title is odd. This is less confusing and mirrors the "format" of the title to section 4.2.

The proposed revision to section 4.1.2 clarifies the provision. The term "major service component" introduced a term that is unnecessary. Additionally, the parenthetical statement is not enforceable. It is questionable if it complies with the NFPA Manual of Style. This revision makes the section enforceable.

Submitter Information Verification

Submitter Full Name: Paul Haake
Organization: Maui Fire Department
Affiliation: Hawaii State Fire Council, Fire Prevention Committee
Street Address:
City:
State:
Zip:
Submittal Date: Mon Sep 09 12:13:25 EDT 2013

Copyright Assignment

I, Paul Haake, hereby irrevocably grant and assign to the National Fire Protection Association (NFPA) all and full rights in copyright in this Public Input (including both the Proposed Change and the Statement of Problem and Substantiation). I understand and intend that I acquire no rights, including rights as a joint author, in any publication of the NFPA in which this Public Input in this or another similar or derivative form is used. I hereby warrant that I am the author of this Public Input and that I have full power and authority to enter into this copyright assignment.

By checking this box I affirm that I am Paul Haake, and I agree to be legally bound by the above Copyright Assignment and the terms and conditions contained therein. I understand and intend that, by checking this box, I am creating an electronic signature that will, upon my submission of this form, have the same legal force and effect as a handwritten signature.
4.1.1 The authority having jurisdiction (AHJ) shall maintain a written statement or policy that establishes the following:

1. Existence of the FPO
2. Services that the FPO will provide
3. Basic organizational structure
4. Expected number of FPO members
5. Functions that FPO members are expected to perform
6. Any outsourcing of functions to private parties or other jurisdictions that affect the FPO

Statement of Problem and Substantiation for Public Input

Many jurisdictions now require third party plan review services and/or inspections, either outsourced through the city or requiring the applicant to hire such review, in order to reduce staffing needs. Some jurisdictions have mutual aid agreements including to allow and/or require plan reviews, inspections, investigations, etc. by the other jurisdiction.

Submitter Information Verification

Submitter Full Name: Bob Morgan  
Organization: Fort Worth Fire Department  
Affiliation: Fire Advisory Board to the North Central Texas Council of Governments  
Street Address:  
City:  
State:  
Zip:  
Submittal Date: Tue May 07 13:56:15 EDT 2013  

Copyright Assignment

I, Bob Morgan, hereby irrevocably grant and assign to the National Fire Protection Association (NFPA) all and full rights in copyright in this Public Input (including both the Proposed Change and the Statement of Problem and Substantiation). I understand and intend that I acquire no rights, including rights as a joint author, in any publication of the NFPA in which this Public Input in this or another similar or derivative form is used. I hereby warrant that I am the author of this Public Input and that I have full power and authority to enter into this copyright assignment.

By checking this box I affirm that I am Bob Morgan, and I agree to be legally bound by the above Copyright Assignment and the terms and conditions contained therein. I understand and intend that, by checking this box, I am creating an electronic signature that will, upon my submission of this form, have the same legal force and effect as a handwritten signature.
Rank within structure of FPO
If the staff of the FPO is contained within a fire department or organization that recognizes rank amongst its entire staff in other divisions, then the FPO staff shall have rank within accordance to the other divisions within the organization.

Statement of Problem and Substantiation for Public Input
In many cases FPO's do not carry rank within departments that have rank amongst its structure. The FPO should carry rank in order to conduct its task and be able to direct other employees when working with varied employees on a complex issue or problem.

Submitter Information Verification
Submitter Full Name: Gary Styers
Organization: Mooresville Fire Department
Street Address: City:
State: Zip:
Submittal Date: Thu Aug 29 15:39:34 EDT 2013

Copyright Assignment
I, Gary Styers, hereby irrevocably grant and assign to the National Fire Protection Association (NFPA) all and full rights in copyright in this Public Input (including both the Proposed Change and the Statement of Problem and Substantiation). I understand and intend that I acquire no rights, including rights as a joint author, in any publication of the NFPA in which this Public Input is this or another similar or derivative form is used. I hereby warrant that I am the author of this Public Input and that I have full power and authority to enter into this copyright assignment.

By checking this box I affirm that I am Gary Styers, and I agree to be legally bound by the above Copyright Assignment and the terms and conditions contained therein. I understand and intend that, by checking this box, I am creating an electronic signature that will, upon my submission of this form, have the same legal force and effect as a handwritten signature.
4.3.1
The FPO shall develop an MIS for the FPO.

Statement of Problem and Substantiation for Public Input

This eliminates redundancy in the provision so that it reads more clearly.

Submitter Information Verification

Submitter Full Name: Paul Haake
Organization: Maui Fire Department
Affiliation: Hawaii State Fire Council, Fire Prevention Committee
Street Address:
City:
State:
Zip:
Submittal Date: Mon Sep 09 12:19:55 EDT 2013

Copyright Assignment

I, Paul Haake, hereby irrevocably grant and assign to the National Fire Protection Association (NFPA) all and full rights in copyright in this Public Input (including both the Proposed Change and the Statement of Problem and Substantiation). I understand and intend that I acquire no rights, including rights as a joint author, in any publication of the NFPA in which this Public Input in this or another similar or derivative form is used. I hereby warrant that I am the author of this Public Input and that I have full power and authority to enter into this copyright assignment.

☑ By checking this box I affirm that I am Paul Haake, and I agree to be legally bound by the above Copyright Assignment and the terms and conditions contained therein. I understand and intend that, by checking this box, I am creating an electronic signature that will, upon my submission of this form, have the same legal force and effect as a handwritten signature.
4.6.3 The CRA shall be distributed to agencies, departments, and employees having responsibilities designated in the Community Risk Reduction (CRR) Plan established in accordance with section 5.2.8(1).

Statement of Problem and Substantiation for Public Input

4.6.3 is the first reference to the "plan". Without a previous reference identifying what this plan is, there will be confusion as to what "plan" this section is referencing. This simply directs the user to the section that outlines what is meant by the current language.

Submitter Information Verification

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4.6.6 After a CRA is obtained, a CRR plan shall be developed and approved by the FPO leader.

Statement of Problem and Substantiation for Public Input

This document doesn’t ever tell the FPO to develop a CRR plan. And such plans should be approved by the FPO leader.

Submitter Information Verification

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4.8.1 The FPO shall have training and education programs, certification requirements and policies to ensure that personnel are trained to a standard set by the FPO, and that a minimum level of competency is maintained in order to effectively, efficiently, and safely execute all responsibilities.

4.8.2 The FPO leadership shall coordinate training, maintain training and certification records, and assist in evaluating the effectiveness of the program.

Statement of Problem and Substantiation for Public Input

Section 4.8.1 This added language recognizes the value of individual personnel certification to ensure technical competency of personnel and authorizes the FPO to establish minimum levels of technical competency for its staff.

Section 4.8.2 Consistent with the change to Section 4.8.1.

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### 4.8.2
The FPO leader shall coordinate training, maintain training records, and assist in evaluating the effectiveness of the program.

### Statement of Problem and Substantiation for Public Input
Section 4.2.1 requires the FPO to have a leader, not a leadership. This coordinates the provision with section 4.2.1.

### Submitter Information Verification

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<thead>
<tr>
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<td>Organization:</td>
<td>Maui Fire Department</td>
</tr>
<tr>
<td>Affiliation:</td>
<td>Hawaii State Fire Council, Fire Prevention Committee</td>
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<tr>
<th>Public Input No. 76-NFPA 1730-2013 [ Section No. 4.9 ]</th>
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### 4.9

The **AHJ FPO leader** shall develop, establish, and implement policies and procedures to ensure compliance with this standard.

**Statement of Problem and Substantiation for Public Input**

It is not the AHJ, but the FPO leader that is given this authority per section 4.2.1.

**Submitter Information Verification**

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5.3.4 The FPO shall analyze the profile data and identify risks facing the community.

Statement of Problem and Substantiation for Public Input

Section 5.3.4 is unnecessary. This is already appears to be required by section 5.3.1.

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6.4.1 Fire suppression personnel who meet the qualifications of NFPA 1021 may conduct in-service code enforcement inspections where approved by the AHJ.

Statement of Problem and Substantiation for Public Input

Requiring fire suppression personnel to meet the job performance requirements of a fire inspector would be cost prohibitive and provide little value in inspecting low-risk occupancies. The proposed standard already allows a provision for the AHJ to allow self-inspections by building owners and occupants who are not trained. Several departments already have substantial in-service inspection programs being carried out by fire suppression personnel. There is no justification to require these personnel to meet the job performance requirements of a fire inspector, such as determining an occupant load, in order to carry out these inspections. NFPA 1021, 2014 edition, section 4.5.1 would suggest that fire officers are sufficiently trained to carry out inspection task following departmental procedures.

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6.6.1 Occupancies under the authority of other jurisdictions need not be inspected.

Statement of Problem and Substantiation for Public Input

In many states, local agencies are not the AHJ of certain occupancies often including state-owned properties. Federal properties are usually inspected by the federal government as well. Inspecting these occupancies and properties would be redundant and not cost effective. The local fire department should however make efforts to conduct pre-fire surveys of these occupancies and properties if they are the first responder or participate in a mutual aid agreement.

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6.6.2
Code enforcement inspections shall be limited to publicly accessible parts of occupancies unless permission is obtained by the owner / occupant to enter non-public areas.

Statement of Problem and Substantiation for Public Input

Fire inspectors could be subject to a trespassing complaint. For years the old Building Officials and Code Administrators National Fire Prevention Code commentary stated "Permit applications forms typically include a statement in the certification signed by the applicant (who is the owner or owner's agent) granting the code official the authority to enter areas covered by the permit in order to enforce code provisions related to the permit." The International Code Council fire code permit applications have language "I understand that by applying for this permit, I am consenting to the inspection of this property and to the entry onto the property by inspectors of the authority having jurisdiction for the purpose of performing the necessary inspections during normal business hours for the duration of the permit." Fire inspectors generally are not aware of the provisions of See vs. Seattle and the limits on their right of entry. It would also create a great burden on the AHJ’s legal department to have to obtain a warrant each time an owner / occupant refuse to submit to an inspection of the non-public areas of their occupancy.

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Public Input No. 66-NFPA 1730-2013 [New Section after 6.6]

6.6.2 Operational permit inspections
In lieu of the inspection frequencies cited in table 6.6, the AHJ may adopt an operational permit program based on an adopted model fire code. Inspection frequencies may be based on loss history and potential as well as the availability of personnel to perform inspections.

Statement of Problem and Substantiation for Public Input
Permit inspections are technically valid and include occupancies with a high potential for loss of life and severe property loss. Permits regulate hazardous materials, storage, and processes based on the nation's historical fire experience. The burden of obtaining permits is on the occupant or owner, not the jurisdiction. Permits applications can serve as a tool to gain entrance into structures and also provide a cost recovery mechanism for the jurisdiction to enforce the permit through fees. Occupancies requiring permits have the most potential for fire and loss of life. The AHJ should be allowed to determine its own inspection frequency based on loss potential and resources.

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This chapter establishes the organization and deployment for plan reviews and field acceptance inspections for new construction and renovation of existing buildings.

Statement of Problem and Substantiation for Public Input

It is clear in subsequent sections of this chapter these reviews and inspections are focused on new construction and renovation work. Clearly stating this in the Scope of this chapter creates conformity with subsequent sections and the intent of this chapter.

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Public Input No. 78-NFPA 1730-2013 [ Section No. 7.1.3 ]

### 7.1.3

Code enforcement inspection in existing occupancies are contained in Chapter 6.

**Statement of Problem and Substantiation for Public Input**

Chapter 7 addresses plan review. Section 7.1.3 references chapter 6 for code enforcement inspections. This reference is unnecessary.

**Submitter Information Verification**

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Public Input No. 79-NFPA 1730-2013 [ Section No. 7.2 ]

7.2 Purpose.
The purpose of this chapter is to establish the organization and deployment for the FPO as it relates to plan review for emergency vehicle access, water supply, new construction, change of occupancy use, renovations, and change or addition of fire and life safety systems, and associated acceptance field inspections.

Statement of Problem and Substantiation for Public Input

The term "change in occupancy use" is ambiguous. The deletion of the word "use" is to clarify that this is referring to a "change in occupancy", not a "change in use of occupancy". If it is intended that it address both "change in occupancy" and a "change in use of an occupancy", then both should be included in this sentence as noted.

The reference to field inspections appears unnecessary, since chapter 7 applies to Plan Review. If it is intended that plan review address "shop drawings", then this needs to be revised to address plans with changes made after field inspection corrections.

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7.6.8* Fire and Life Safety Systems Field Acceptance Inspections.
A fire and life safety system field acceptance inspection shall be conducted to ensure compliance with applicable codes and standards.

Statement of Problem and Substantiation for Public Input

The terms "inspection" and "review" refer to different tasks and including them in the same phrase creates confusion. The intent of this section is to conduct a "system field acceptance inspection" and not a review of a plan. Deletion of the term review clarifies this is to be a physical inspection of the system to ensure compliance with the code.

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8.4.1.1
A training, education, and professional development program with a goal of preventing occupational deaths, injuries, and illnesses shall also be provided.

Statement of Problem and Substantiation for Public Input

The word also in this section implies there are other items in this same section that are provided. No other items or training is provided here and the word is not needed.

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8.6.1.1 Where evidence of arson or other criminal activity is detected or suspected, the FPO shall notify the appropriate law enforcement agency whose has jurisdictional authority to investigate criminal matters.

**Statement of Problem and Substantiation for Public Input**

Most fire investigators do not have the legal authority to conduct a criminal investigation or death investigation. These investigations are routinely handled by the local police and they have resources that may help in determining criminal intent and locating potential suspects. Some examples would be incase of domestic arson, the police already have a substantial history of the occupants. Where fraud is suspected, the police normally can obtain a warrant relating to financial records.

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8.6.4.1.1 Evidence from non-intentional fires that do not involve fatal or near fatal injuries should be left at the scene for follow-up investigators. The evidence should be protected from further damage and the scene should be left secured from entry.

Statement of Problem and Substantiation for Public Input

Removing evidence in accidental fires may be potentially destructive and cause spoilage. The fire department investigators job is to determine the origin and cause of a fire in order to complete the National Fire Incident Report and/or to determine if there is an arson. The private insurance investigator is responsible to investigate a fire that may potentially be a subrogation case for the insurance company. Public fire investigators for the most part should not take on the liability of handling evidence that is used in a civil trial.

Submitter Information Verification

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8.6.4.2

The FPO shall have an SOG for the collection, examination, testing, preservation, and storage of evidence in accordance with NFPA 921, Guide for Fire and Explosion Investigations, ASTM E 860, Standard Practice for Examining and Preparing Items That Are or May Become Involved in Criminal or Civil Litigation, and ASTM E 1188, Standard Practice for Collection and Preservation of Information and Physical Items by a Technical Investigator.

Statement of Problem and Substantiation for Public Input

The section fails to mention the NFPA's own document which is an excellent resource guide in conducting investigations. Many investigators use the field version of this guide and have no regular access to the ATSM Standards.

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9.3 Risk Assessment.
The FPO shall evaluate and incorporate the CRA as referenced in Chapter 5 when establishing appropriate components of the CRR Plan required by section 5.2.6(1) when developing and revising public education programs.

Statement of Problem and Substantiation for Public Input

The CRA is the basis for the Community Risk Reduction Plan that reduces the community risk. It is more appropriate for the FPO to use the Plan required in chapter 5 to develop programs rather than the assessment which is the basis for the Plan. Additionally, the phrase "developing and revising" is more consistent with other language in the standard.

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Public Input No. 82-NFPA 1730-2013 [ New Section after 9.7 ]

Fire and Life Safety For Individuals with Special Access and Functional Needs

Design appropriate programs for targeted audiences with specific objectives.

- Targeted Audiences: Autism, Down Syndrome, Cerebral Palsy, ... all students in special day classrooms, focused on the K-8th grade level and their families.
- Training: Fire Fighters must complete an appropriate training course/workshop so personnel are better able to understand and manage unexpected behaviors from patients with special needs and in order to provide appropriate medical treatment.
- Program Design- Trained with handling those with special needs, Fire Fighters pay an annual visit to school classrooms where students with special needs are located. A safe and more intimate setting is often the best venue for persons who may have vision or hearing loss, or sensory issues.
- FFs to provide students with an "gentle' introduction to who a FF is, what he wears, what he does and why. FF dresses in turn-out gear infront of students. FF allows other students to wear his turn-out gear. FF reads an appropriate story to students.
- Program Design- Trained with handling those with special needs, Fire Fighters pay an annual visit to school classrooms where students with special needs are located. A safe and more intimate setting is often the best venue for persons who may have vision or hearing loss, or sensory issues.

Training:

- Fire Fighters must complete an appropriate training course/workshop so personnel are better able to understand and manage unexpected behaviors from patients with special needs and in order to provide appropriate medical treatment.
- Program Design- Trained with handling those with special needs, Fire Fighters pay an annual visit to school classrooms where students with special needs are located. A safe and more intimate setting is often the best venue for persons who may have vision or hearing loss, or sensory issues.
- FFs to provide students with an "gentle' introduction to who a FF is, what he wears, what he does and why. FF dresses in turn-out gear infront of students. FF allows other students to wear his turn-out gear. FF reads an appropriate story to students.
- Program Design- Trained with handling those with special needs, Fire Fighters pay an annual visit to school classrooms where students with special needs are located. A safe and more intimate setting is often the best venue for persons who may have vision or hearing loss, or sensory issues.
- FFs to provide students with an "gentle' introduction to who a FF is, what he wears, what he does and why. FF dresses in turn-out gear infront of students. FF allows other students to wear his turn-out gear. FF reads an appropriate story to students.

Fire Fighters must complete an appropriate training course/workshop so personnel are better able to understand and manage unexpected behaviors from patients with special needs and in order to provide appropriate medical treatment.
- Program Design- Trained with handling those with special needs, Fire Fighters pay an annual visit to school classrooms where students with special needs are located. A safe and more intimate setting is often the best venue for persons who may have vision or hearing loss, or sensory issues.
- FFs to provide students with an "gentle' introduction to who a FF is, what he wears, what he does and why. FF dresses in turn-out gear infront of students. FF allows other students to wear his turn-out gear. FF reads an appropriate story to students.
- Program Design- Trained with handling those with special needs, Fire Fighters pay an annual visit to school classrooms where students with special needs are located. A safe and more intimate setting is often the best venue for persons who may have vision or hearing loss, or sensory issues.
- FFs to provide students with an "gentle' introduction to who a FF is, what he wears, what he does and why. FF dresses in turn-out gear infront of students. FF allows other students to wear his turn-out gear. FF reads an appropriate story to students.

Evaluation:

Teachers to fill out and return evaluation forms.
Student eval forms, which are also visual in nature, are filled out by students with teachers assist, and sent home to parents for further sharing among the family.

Statement of Problem and Substantiation for Public Input

When it comes to fire and life safety, our most vulnerable citizens are those with special access and functional needs. Many can not self-evacuate. Other will require special assistance in order to maintain personal safety or evacuate in an emergency, such as a building fire. Many Fire Fighters are not properly trained to understand and manage high-risk populations, the autistic community as one example. Citizens with a family member with special needs can be unaware of the greater risk they face if they are confronted by an emergency situation.
- Fire Fighters, properly trained on how to manage and understand those with special needs, can lower the risks of accidental death and injury rates with in the special needs community population.
- Properly trained Fire Fighters that provide an appropriate public education program to individuals with special needs and their families, on planning and responding to emergencies, can lower the risks of death and injury in these communities.

Submitter Information Verification

Submitter Full Name: Kathryn Turner
Organization: The MediPal Company
Street Address: 
City: 
State: 
Zip: 
Submittal Date: Mon Sep 09 15:22:41 EDT 2013

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9.7.1 Educational programs shall be developed based on the CRA-conducted CRR Plan established in accordance with Chapter 5 of this standard.

Statement of Problem and Substantiation for Public Input

The CRR Plan is the tool used to reduce community risk. The assessment provides the data that develops the plan. The plan is a more appropriate basis for the development of the programs in this section.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member 1730 TC
Street Address:
City:
State:
Zip:
Submittal Date: Fri Apr 26 16:55:18 EDT 2013

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9.7.6*

Educational programs developed under this standard shall have defined course objectives that address identified fire and injury causes as identified by the CRA required by Chapter 5.

Statement of Problem and Substantiation for Public Input

The CRA is not in chapter 5, it is required by chapter 5.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member 1730 TC
Street Address:
City:
State:
Zip:
Submittal Date: Fri Apr 26 17:03:54 EDT 2013

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9.9.7
The instructor's delivery of the educational program shall be evaluated for effectiveness and adherence to professional qualifications or and are conducted, within the scope of their training, education, and experience.

Statement of Problem and Substantiation for Public Input

This evaluation of the instructor's delivery should BOTH adhere to the professional standards AND be within the scope of their training and experience. As written they can be in compliance with and out of the other and still be conforming to the standard.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member 1730 TC
Street Address:
City:
State:
Zip:
Submittal Date: Fri Apr 26 17:06:32 EDT 2013

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9.10.1.1 Educational programs for school-age target audiences shall be developed based on the CRA-conducted CRR Plan developed in accordance with Chapter 5.

Statement of Problem and Substantiation for Public Input

The CRR Plan is the basis for the strategies used in the community to reduce risk. The CRA develops the data that support and justify the Plan. This language makes it clear that the Plan guides the development of these programs.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member 1730 TC
Street Address:
City:
State:
Zip:
Submittal Date: Fri Apr 26 17:11:59 EDT 2013

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9.10.1.4
All educational programs should comply with applicable regional and state educational requirements.

Statement of Problem and Substantiation for Public Input
Stating that "all programs shall" comply with local standards may prevent local agencies from using nationally produced programs, such as NFPA or USFA products.

Submitter Information Verification
Submitter Full Name: Jennifer Rubin
Organization: Mercy San Juan Medical Center
Affiliation: Safe Kids Greater Sacramento
Street Address: 
City: 
State: 
Zip: 
Submittal Date: Thu Jul 25 17:09:12 EDT 2013

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Public Input No. 17-NFPA 1730-2013 [Section No. 9.10.2.1]

9.10.2.1
Educational programs for students in higher education shall be developed based on the CRA conducted CRR Plan developed in accordance with Chapter 5.

Statement of Problem and Substantiation for Public Input

The CRR Plan is the basis for the strategies used in the community to reduce risk. The CRA develops the data that support and justify the Plan. This language makes it clear that the Plan guides the development of these programs.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member 1730 TC
Street Address: 
City: 
State: 
Zip: 
Submittal Date: Fri Apr 26 17:17:21 EDT 2013

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Educational programs for independent senior adults shall be developed based on the CRA-conducted CRR Plan developed in accordance with Chapter 5.

Statement of Problem and Substantiation for Public Input

The CRR Plan is the basis for the strategies used in the community to reduce risk. The CRA develops the data that support and justify the Plan. This language makes it clear that the Plan guides the development of these programs.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member 1730 TC
Street Address: 
City: 
State: 
Zip: 
Submittal Date: Fri Apr 26 17:21:04 EDT 2013

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9.10.4.1 Adult and community-wide educational programs shall be developed based on the CRA-conducted CRR Plan developed in accordance with section Chapter 5.

Statement of Problem and Substantiation for Public Input

The CRR Plan is the basis for the strategies used in the community to reduce risk. The CRA develops the data that support and justify the Plan. This language makes it clear that the Plan guides the development of these programs.

This also removes an errant "section" in the text.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member 1730 TC
Street Address:
City:
State:
Zip:
Submital Date: Fri Apr 26 17:22:39 EDT 2013

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9.10.5.1  
Workplace educational programs shall be developed based on the CRA-conducted CRR Plan developed in accordance with Chapter 5.

Statement of Problem and Substantiation for Public Input

The CRR Plan is the basis for the strategies used in the community to reduce risk. The CRA develops the data that support and justify the Plan. This language makes it clear that the Plan guides the development of these programs.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member 1730 TC
Street Address:
City:
State:
Zip:
Submittal Date: Fri Apr 26 17:26:09 EDT 2013

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Public Input No. 37-NFPA 1730-2013 [Section No. 9.10.6]

9.10.6 Juvenile Youth Firesetter Educational Programs.

9.10.6.1* Juvenile Youth firesetter (JFS) educational programs shall be developed based on the CRA conducted in accordance with Chapter 5.

9.10.6.2 Juvenile Youth firesetter programs shall be targeted at juveniles who exhibit behaviors associated with setting fires.

9.10.6.3* Juvenile Youth firesetter educational programs shall include the availability of mental and social counseling services.

9.10.6.4* Juvenile Youth firesetter programs shall have defined course objectives that address specific fire-setting behaviors exhibited by the participating student(s) or identified by local or nationally recognized objectives for the target audience.

9.10.6.5* State and local requirements of record keeping, reporting, and confidentiality associated with juveniles shall be followed.

Statement of Problem and Substantiation for Public Input

Update standard to use current industry language of "youth" in place of "juvenile".

Submitter Information Verification

Submitter Full Name: Jennifer Rubin
Organization: Mercy San Juan Medical Center
Affiliation: Safe Kids Greater Sacramento
Street Address:
City: 
State: 
Zip: 
Submittal Date: Thu Jul 25 17:10:22 EDT 2013

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9.10.6.1* Juvenile firesetter (JFS) educational programs shall be developed based on the CRA-conducted CRR Plan developed in accordance with Chapter 5.

Statement of Problem and Substantiation for Public Input

The CRR Plan is the basis for the strategies used in the community to reduce risk. The CRA develops the data that support and justify the Plan. This language makes it clear that the Plan guides the development of these programs.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member 1730 TC
Street Address: 
City: 
State: 
Zip: 
Submittal Date: Fri Apr 26 17:29:31 EDT 2013

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9.10.7.1

Home safety education programs shall be developed based on the CRA-conducted CRR Plan developed in accordance with section Chapter 5.

Statement of Problem and Substantiation for Public Input

The CRR Plan is the basis for the strategies used in the community to reduce risk. The CRA develops the data that support and justify the Plan. This language makes it clear that the Plan guides the development of these programs.

This change also removes an errant "section" placed in this section.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member 1730 TC
Street Address:
City:
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Submittal Date: Fri Apr 26 17:31:19 EDT 2013

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9.11.1**
Alternative education materials and messages shall be developed based on the CRA-conducted CRR Plan developed in accordance with Chapter 8.

Statement of Problem and Substantiation for Public Input

The CRR Plan is the basis for the strategies used in the community to reduce risk. The CRA develops the data that support and justify the Plan. This language makes it clear that the Plan guides the development of these programs.

Submitter Information Verification

Submitter Full Name: James Dawson
Organization: Chesterfield County Fire & EMS
Affiliation: Member 1730 TC
Street Address:
City:
State:
Zip:
Submittal Date: Fri Apr 26 17:33:27 EDT 2013

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A.4.2.2
See section A.4.6 for a methodology to determine the adequate size for an FPO.

Statement of Problem and Substantiation for Public Input

This revision will provide the reader of section 4.2.2 with information about a methodology to determine the proper size that an FPO should be.

Submitter Information Verification

Submitter Full Name: Paul Haake
Organization: Maui Fire Department
Affiliation: Hawaii State Fire Council, Fire Prevention Committee
Street Address:
City:
State:
Zip:
Submittal Date: Mon Sep 09 12:48:16 EDT 2013

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A.6.5

See section A.4.6 for a methodology to determine the adequate size for an FPO.

Statement of Problem and Substantiation for Public Input

This is similar to PI 80 adding A.4.2.2. Section 6.5 in the body of the code indicated it had an annex section with an asterisk. This annex statement provides the reader of section 6.5 with information about a methodology to determine the proper size that an FPO should be. Note that chapter 6 is specifically for fire prevention inspection and code enforcement activities, not plan review and public education.

<table>
<thead>
<tr>
<th>Related Public Inputs for This Document</th>
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</thead>
<tbody>
<tr>
<td>Related Input</td>
</tr>
<tr>
<td>Public Input No. 80-NFPA 1730-2013 [New Section after A.3.3.2.3]</td>
</tr>
</tbody>
</table>

Submitter Information Verification

Submitter Full Name: Paul Haake
Organization: Maui Fire Department
Affiliation: Hawaii State Fire Council, Fire Prevention Committee
Street Address:
City:
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Submittal Date: Mon Sep 09 12:51:40 EDT 2013

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A.6.4 Qualifications of Personnel. Personnel shall hold a Fire Inspector I or Fire Inspector II Certification awarded by an accredited certification body or equivalent. Said certification(s) shall be appropriate for their job title and ensure technical competency in the assigned responsibilities, as determined by the FPO.

Statement of Problem and Substantiation for Public Input

This language in the appendix gives further guidance for ensuring a minimum level of technical competency through recognition of individual personnel certification. The determination of the types and levels of certification and which certifying agencies are appropriate is left with the FPO.

Submitter Information Verification

Submitter Full Name: FULTON COCHRAN
Organization: HENDERSON CITY OF
Affiliation: ICC Fire Service Membership Council Governing Committee
Street Address:
City:
State:
Zip:
Submittal Date: Tue Sep 10 09:16:37 EDT 2013

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State agencies are often the authority having jurisdiction over schools, colleges and universities, penal institutions, hospitals, nursing homes, day-care centers, and places of public assembly.

Statement of Problem and Substantiation for Public Input

This appendix section is needed to clarify what constitutes an occupancy not in the AHJ's jurisdiction.

Submitter Information Verification

Submitter Full Name: DOUGLAS WARSINSKI
Organization: VIGILANT INSPECTIONS
Street Address: 
City: 
State: 
Zip: 
Submittal Date: Sun Sep 01 13:47:57 EDT 2013

Copyright Assignment

I, DOUGLAS WARSINSKI, hereby irrevocably grant and assign to the National Fire Protection Association (NFPA) all and full rights in copyright in this Public Input (including both the Proposed Change and the Statement of Problem and Substantiation). I understand and intend that I acquire no rights, including rights as a joint author, in any publication of the NFPA in which this Public Input in this or another similar or derivative form is used. I hereby warrant that I am the author of this Public Input and that I have full power and authority to enter into this copyright assignment.

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A 6.6.2
The right of a fire inspector to enter buildings to conduct fire inspections is limited by the U.S. Supreme Court to only the public areas of a building, See vs. Seattle. The consent of the owner or an administrative warrant must obtain to inspect non-public areas. Where occupancies or activities require a fire code permit, model codes agencies recommend obtaining consent in writing as part of an application from the owner or occupant to inspect non-public areas. Insurance policies usually give the right to the insurance companies to inspect these areas or coverage may be denied.

Statement of Problem and Substantiation for Public Input
Many fire inspectors are not aware of the fourth amendment rights of building owners and occupants. Inspectors must be aware that they are only allowed free access to public portions of the occupancy. The section is needed to relieve the AHJ of the responsibility of having to get a warrant to inspect the non-public areas if the owner or occupant refuses. The AHJ would have to demonstrate a reasonable belief that a fire code violation exist in order to obtain a warrant.

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A.7.4 Qualifications of Personnel. Personnel shall hold an appropriate certification (such as Fire Plans Examiner) awarded by an accredited certification body or equivalent. Said certification(s) shall be appropriate for their job title and ensure technical competency in the assigned responsibilities, as determined by the FPO.

Statement of Problem and Substantiation for Public Input

This language in the appendix gives further guidance for ensuring a minimum level of technical competency through recognition of individual personnel certification. The determination of the types and levels of certification and which certifying agencies are appropriate is left with the FPO.

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A 8.6.4.1.1
Depending on the scope of the investigation, evidence may be of interest to other investigators such as insurance investigators, engineers, or manufacturer's representatives for civil litigation and subrogation.

Statement of Problem and Substantiation for Public Input

This appendix section is needed to clarify the need to leave evidence that may be useful for subrogation alone. In many circumstances subrogation evidence is not removed until all parties, including defendants, have a chance to see it.

Submitter Information Verification

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Submittal Date: Sun Sep 01 13:43:02 EDT 2013

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A 8.6.1.1
Early police involvement is essential in obtaining warrants, apprehending suspects, and to present the case to prosecuting attorneys.

Statement of Problem and Substantiation for Public Input

Fire investigators without police power need to work directly with law enforcement as soon as the possibility of a crime exist. The fire investigators role in these cases is to determine origin and cause. In order for a successful prosecution to take place, coordination with law enforcement needs to take place at the very beginning.

Submitter Information Verification

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B.3.1  Demographic Risk Assessment.

On the worksheet in Table B.3.1, identify vulnerable groups and associated occupancies, transient populations and associated occupancies, and cultural groups and languages in the community, then list the community’s risks relating to demographics.

Table B.3.1 Demographic Risk Assessment Worksheet

<table>
<thead>
<tr>
<th>Ages of Population</th>
<th># of People</th>
<th>Percent of Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-4</td>
<td></td>
<td>%</td>
</tr>
<tr>
<td>5-14</td>
<td></td>
<td>%</td>
</tr>
<tr>
<td>15-64</td>
<td></td>
<td>%</td>
</tr>
<tr>
<td>65 and over</td>
<td></td>
<td>%</td>
</tr>
<tr>
<td>Total Population</td>
<td></td>
<td>%</td>
</tr>
</tbody>
</table>

Statement of Problem and Substantiation for Public Input

The demographic risk group 5-14 was not identified in Table B.3.1 "Demographic Risk Assessment Worksheet". Changing this worksheet would include this group. This is often the age group we deal with in our Juvenile Firesetters program.

Submitter Information Verification

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