



National Fire Protection Association
Washington Office FIREfax®

Priority Communication

Date: 2/3/09
To: MOSH Docket Number 063-A
From: Nancy M. Gull
1401 K Street, NW Suite 500
Washington, DC 20005
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SUBJECT:

please excuse my delay in sending this letter, I did not receive comments from HQ until yesterday.

Nancy M. Gull

Total Pages: 4 (Including Cover Sheet)

NFPA is the premier source worldwide for the development and dissemination of knowledge about fire and life safety.

NFPA's mission is to reduce the worldwide burden of fire and other hazards on the quality of life by providing and advocating scientifically-based consensus codes and standards, research, training, and education.

**National Fire Protection Association**

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February 2, 2009

Ms. Christine Branche
Acting Director of the National Institute for Occupational Safety and Health
Centers for Disease Control and Prevention
U.S. Department of Health and Human Services
Robert A. Taft Laboratories
Mailstop C34
4476 Columbia Parkway
Cincinnati, Ohio 45226

RE: Draft Fire Fighter Fatality Investigation and Prevention Program [Docket No. NIOSH 063-A]

Dear Ms. Branche:

The National Fire Protection Association (NFPA) commends the National Institute for Occupational Safety and Health (NIOSH) of the Centers for Disease Control and Prevention (CDC), Department of Health and Human Services (HHS) for giving us the opportunity to provide comments related to your request for information concerning the Fire Fighter Fatality Investigation and Prevention Program (FFFIPP). Although it is belated, we have taken this opportunity to provide the following general comments on some of the larger issues associated with the FFFIPP strategic plan.

Strategic Goal 1: Sudden cardiac death accounts for the largest share of on-duty firefighter fatalities each year. NFPA strongly supports efforts to reduce these fatalities. NFPA promulgates and publishes two standards relevant to this strategic goal, NFPA 1582, *Standard on Comprehensive Occupational Medical Program for Fire Departments*, and NFPA 1583, *Standard on Health-Related Fitness Programs for Fire Department Members*. NIOSH has been active with the Fire Service Occupational Safety and Health Committee in maintaining these documents and we encourage continued participation to ensure the documents are kept current. Also, it is important that NIOSH work with NFPA to ensure fire departments are aware of these documents and encourage departments to use them in local programs to reduce sudden cardiovascular deaths. In addition, the NFPA supports the IAFF/IAFC Fire Service Joint Labor Management Wellness-Fitness Initiative as a program that will help reduce sudden cardiovascular deaths. In studies of sudden cardiovascular deaths, it has been revealed that in many of the deaths, there were pre-existing known health problems including coronary artery disease, previous heart attacks, and other problems that should have resulted in the firefighter retiring from active service but the individual continued

to participate in firefighting. A method needs to be found to keep persons with known health problems from actively participating in emergency scene operations.

Strategic Goal 2 - Intermediate Goals 2.3. NFPA's codes and standards development committees greatly value the reports produced by NIOSH's firefighter fatality investigation program for the technical information they contribute to the committees' deliberations. NFPA has several standards that deal with the design, maintenance, operation, and training of firefighters regarding firefighter personal protective equipment. The committee members are continuously reviewing new technology for its potential application to personal protective equipment. The investigative reports provide details of failures that can then be analyzed, allowing us to refine our standards to address the failure points, and NIOSH personnel and programs are directly involved with the committees, bringing technical expertise to the committee which results in standards being maintained current and technically accurate.

Strategic Goal 3 - Intermediate Goal 3.4: NFPA has several standards that deal with the design, maintenance, operation, and training related to fire service vehicles and apparatus. The technical committees for those standards review the investigative reports for details of failures that can then be addressed in standards whether it is equipment design changes, inspection practices, professional qualification of driver/operators, or ongoing training. The NFPA standards development process results in current and technically accurate standards that are continuously maintained. NIOSH citation of appropriate NFPA standards in the Fire Fighter Fatality Investigation and Prevention Program reports helps promote these standards for their ultimate purpose, firefighter safety.

Strategic Goal 4 – Each year, firefighters die from causes other than cardiovascular, structure fires and motor vehicles. These deaths sometimes result from unique or odd situations but they also include vehicle and wildland fires, training accidents, and non-emergency activities. NFPA promulgates and publishes a standard, NFPA 1500, *Standard on Fire Department Occupational Safety and Health Program* as an umbrella document designed to address all aspects of firefighter health and safety. The committee responsible for NFPA 1500 uses the reports produced by NIOSH's firefighter fatality investigation program to provide details of failures that need to be addressed as the document is updated. In addition, NFPA has many codes and standards that indirectly address firefighter health and safety. Codes such as NFPA 5000, *Building Construction and Safety Code*[®]; NFPA 101[®], *Life Safety Code*[®]; and NFPA 1, *Fire Code*, contribute to making a safer built environment and with that safer environment comes improved conditions for firefighters who must occasionally fight fires in the buildings.

Activity/Output Goals and Performance Measures: NFPA is pleased to see NIOSH's commitment to carrying out as many investigations as they can manage with their current staffing level, and their focus on the areas that account for the largest share of firefighter deaths annually. The investigation of all fatalities annually would be ideal, but NFPA recognizes that NIOSH cannot meet that goal without additional funding and staffing. NFPA will continue to assist NIOSH by providing staff review and/or data inputs for their reports and publications, as requested.

In Performance Measure E.3, NIOSH is encouraged to communicate directly with other NFPA Technical Committees when the investigation findings are related to a document other than those that deal with fire and emergency services protective clothing and equipment. In addition, NIOSH investigators are encouraged to directly submit proposals for change to a document when they identify an issue during an investigation that should be addressed by or within a standard.

NFPA also suggests that:

- NIOSH state as a specific goal that it will continue to participate in the NFPA process by having representatives on NFPA fire service technical committees.
- NIOSH investigators, in considering the NFPA standards applicable in a given case, point out where fatalities resulted from the failure to comply with these standards, or alternatively, where improvements in the standards may be warranted.
- NIOSH set a goal to obtain and develop the resources and capabilities to investigate every fatality by a certain date, such as January 1, 2015.

NFPA appreciates the opportunity to share our views concerning NIOSH's role in protecting firefighter health and safety. We believe that the goals and constituents of NIOSH are best served when its regulations are tied as closely as possible to codes and standards developed in accordance with a full-consensus process, accredited by the American National Standards Institute (ANSI). We appreciate NIOSH's contributions to our consensus process and their consideration of the Congressional mandate of public law 104-113, as described in OMB Circular A119, to ensure that voluntary consensus codes and standards be used when they are applicable.

If you have any questions or require additional information concerning this matter, please do not hesitate to contact me at (202) 898 1229 or Rita Fahy, PhD, Manager, Fire Databases and Systems, at 617 984 7469.

Sincerely,



Nancy McNabb, AIA
Director, Government Affairs

cc CVarone, RFahy