

## Initiative

# 11

National standards for emergency response policies and procedures should be developed and championed.

*Each fire service organization and each State Fire Agency should work together to adopt a set of standard emergency response objectives that meet minimum standards and that serve as a model for Incident Command, Risk Management and Resource Deployment to enhance firefighter safety, ensure operational effectiveness and support Statewide and National Mutual Aid Systems.*

*Arizona Fire Chiefs Association*

## Executive Summary

Many in the fire service have long argued the need for uniform response standards as a means to increase fire service operational effectiveness, and to also give credibility to the observation that the fire service is a bona fide profession in the sense of education, credentialing, training, and execution. Success has been limited at best due to competing opinions from fire service organizations categorized as volunteer, combination, or career. Unification in the fire service has also been difficult due to geographic demands which drive local priorities and response policies. Unlike many other fire service systems internationally which are organized, trained, and funded at the national level, the U.S. fire service has developed into over 30,000 idiosyncratic and separate systems. Undoubtedly, this is the source of much pride, but it also has led to massive system inadequacies. The 11<sup>th</sup> Initiative calls for a minimum set of activities that are universally recognized and understood to assure life safety at every fire—regardless of organizational composition, or geographic location. Common standards provide the

added benefit of allowing multiple responding agencies to operate with similar strategic and tactical considerations, regardless of the complexity of the event.

## Emergency Response Standards

Emergency response policies are often created at the discretion of the Authority Having Jurisdiction (AHJ), and influenced by the local political climate. Typically, the Executive Fire Officer (EFO) or designee establishes response policies influenced by experience, training, education, available resources, local demographic, federal and state mandates, community expectations, and funding. Policies from different organizations may resemble each other due to networking opportunities, permissive plagiarism, shared training, similar educational experiences, or just by happenstance.

When devising a minimum national response policy for the fire service, we will not have to start from scratch. There already exists excellent response standards put forth by the National Fire Protection Association, including:

**NFPA 13E** *Recommended Practice for Fire Department Operations in Properties Protected by Sprinkler and Standpipe Systems*

**NFPA 450** *Guides for Emergency Medical Services and Systems*

**NFPA 471** *Recommended Practices for Responding to Hazardous Materials Incidents*

**NFPA 1026** *Standard for Incident Management Personnel Professional Qualifications*

**NFPA 1201** *Standard for Providing Emergency Services to the Public*

**NFPA 1500** *Standard on Fire Department Occupational Safety and Health Program*

**NFPA 1710** *Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations and Special Operations to the Public by Career Fire Departments*

**NFPA 1720** *Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations and Special Operations to the Public by Volunteer Fire Departments*

In addition to the NFPA standards, the *Standard of Cover* curriculum sponsored by the Center for Public Safety Excellence (CPSE) provides additional guidelines for fire service delivery and expectations.<sup>1</sup> With the existing NFPA standards and the work done by CPSE, the development of a model national response policy might already be well underway.

Most other industries that propagate life safety standards accept these as the price for continuing to do business in that industry. For example, the Quality System Regulation (QSR) as found in the *21 Code of Federal Regulations Part*

820 is the minimum acceptable standard for medical device manufacturers. Indeed, compliance with the 21 CFR QSR is compulsory. Regulated businesses must adopt a plan for regulatory affair compliance and enforcement, as determined by law. Similarly, hospitals receive accreditation from the Joint Council on Accreditation of Healthcare Organizations (JACHO). If minimum standards are not met, the Council removes hospital accreditation status and the facility loses avenues of reimbursement and the confidence of the community.

Emergency Medical Services (EMS) recognized the need for minimum standards as early as 1984. The American Society for Testing and Materials (ASTM) developed EMS standards with industry cooperation and currently exists as active standard F1339-92 (2003) *Standard Guide for Organization and Operation of Emergency Medical Services Systems*. Included in these minimum standards are components regarding the establishment, operation, and effective management of an EMS system at the local, regional, and state levels. It should be noted, however, that these standards have been developed as a template for industry, and of themselves are not compulsory unless adopted by state or local jurisdictions. But, they do represent consensus standards developed by elements of the entire industry.

**Recommendation # 1:** *To get an idea of what a national response standard would be, read F1339-92 (2003) Standard Guide for Organization and Operation of Emergency Medical Services Systems.*

Dr. Denis Onieal, Superintendent of the National Fire Academy, described the need for such a standard with which to base fire service delivery and to quantify activity, just as EMS did in the early 1980's. For the sake of argument, Dr. Onieal defines levels of service delivery into quality units (with varying levels of service) with local authority retaining the right to adopt a specific level of delivery. In this form, and based on established minimum standards, policy makers can qualify and quantify funding for service.<sup>2</sup> Onieal explains that "quantifying the delivery of fire service would remove fire department administration from the vagaries of political whim, more clearly identify the cost/benefit ratio of more or less fire delivery service, and require that the municipality maintain the standard or suffer the litigious consequences."<sup>3</sup>

### Benefits of National Response Standards

The most obvious benefit of minimum standards for emergency response procedures would be the impact on operational efficiency and effectiveness. According to the NFPA, 72% of fire service rendered in the United States is done so by volunteer fire companies, and most volunteer firefighters (95%) are in departments that protect fewer than 25,000 and more than half are located in small, rural departments that protect fewer than 2,500 people (NFPA Fire Department Profile 2005). For many of these departments, both staffing and funding are perpetual problems. Among many departments, there is a growing

reliance on sharing of resources through automatic and mutual aid agreements. Common standards means that if Agency A responds to a request for assistance into Agency B's locale, Agency B will be able to seamlessly transition into the operational plan of Agency A. Terminology, strategy, tactics, and safety will be characteristically common and a matter of routine. Freelancing, an inherently dangerous practice on the fireground is more easily controlled when standard response policies are in place. So, out of necessity, we see that common response policies and procedures are already at work successfully.

## Getting Started: Identifying Champions, Using Facilitation, & Identifying Stakeholders

We should understand right at the beginning that uniform adoption of model national response policies and procedures will not be a painless process—there will be departments who are comfortable forging their own way, and others who will not immediately grasp the importance of a common vocabulary and sets of procedures. And we should not forget that although the fire service has been unsuccessful thus far in developing one model national response policy, we have had important successes at such undertakings such as OSHA's "two in/two out" rule, and the adoption of individual NFPA standards within states. Some states, such as Texas, have adopted legislation to guarantee compliance with two in/two out.

### • Identifying Champions

Champions at the local level for national response policies will have to be found, and the best place to identify them will be within regional or state fire chief organizations. These organizations have networking capabilities, both formal and informal, and also offer peer-to-peer support. Successful programs, like the Department of Homeland Security's Emergency Response Network (ERN), began with a single individual or small group leading the way. The ERN is an emergency response network primarily focused in the southwest. It was initially championed by Special Agent Art Fiero with the FBI, on special assignment to DHS. The purpose was to create a national information sharing network among public and private communities with vetted membership. Information was limited to security issues and designed to give early warning for terrorist related activities. Champions need to be well-versed on the subject matter, tenacious, dedicated, and able to drop any semblance of ego. Most often, the champion is a volunteer who recognizes a void. Fire service leaders must be able to cooperate and compromise for the collective good.

Roadblocks to this process include positional differences between volunteer and career fire departments. Recruitment and retention becomes an issue with volunteer fire departments if standards are too rigid. If standards are too lax, safety and survivability issues will fall away.

**Recommendation # 2:** *Identify champions (advocates) at the local level for defending national response policies and procedures—those who stand for innovative and positive changes in the fire service.*

- **Facilitation**

Achieving consensus among many competing groups who have a stake in the promulgation of national response policies will be very difficult without skillful facilitation. The fire service should take advantage of consensus building models offered through the ASTM, the National Institute of Standards and Technology (NIST), and the American National Standards Institute (ANSI). These are all standard development organizations who offer facilitation guidance. Chief Gary Morris in his 1987 article, *EMS Standards for the Fire Service* (IAFC, Summer, 1987) described the process where ASTM gathered industry representatives, created committees based on rep input, further identified subcommittees and facilitated the process. After a final consensus vote, an ASTM Standards Committee reviewed the product to make sure all ASTM procedural requirements were complied with and approved. The result of this was a consensus standard. National standards for emergency medical services were developed using external facilitation to do something that may have proved too contentious to manage internally.

**Recommendation # 3:** *Recognize that building consensus is a difficult process that often benefits from outside support and facilitation.*

- **Identification of Stakeholders**

Stakeholders in any process which involves reaching some consensus need to be identified early on, and should include formal or institutional policy makers, and those upon whom the new policy will have the most direct effect—in this case, fire service personnel. Mayor Gus Morrison of Fremont, CA, described in a 2001 editorial to [www.usmayors.org](http://www.usmayors.org), that NFPA 1710 (*Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations and Special Operations to the Public by Career Fire Departments*) would have placed an undue hardship on the Fremont's budget and that he would fight its adoption of the standard—regardless of the Standard's outcome.<sup>4</sup> Political leaders should be recruited to the side of minimum standards and made an ally. This will likely mean compromise, something very difficult for the fire service. Political leadership needs to have some voice in developing a minimum standard since they will be the ones paying for it. They [political leadership] also need to know that if a minimum standard is not supported, the level of service provided to the community could suffer.

Stakeholder groups include fire chiefs, fire officers, and firefighters from

volunteer, combination, and career fire departments (small, medium, and large), and equipment manufacturers. Citizens, the primary recipients of all fire department services, and political policy makers must not be forgotten and should be included in groups which are putting forth policies at the national level. The current EMS standards committee for ASTM boasts 95 members, although over 400 members participated in the consensus building process.

**Recommendation #4:** *Solicit input from the stakeholders. Existing best practice models and standards should be reviewed and evaluated.*

The model adopted by ASTM for EMS branched into six different subcommittees, each reporting to an executive group. The branches were:

- *Equipment*
- *Organization/management*
- *Facilities*
- *Education/training*
- *Communications*
- *Terminology*

Thirty-three subcommittees reported to one of these six branches and many groups would overlap in scope, but this was acceptable within the consensus model. The fire service may could use a similar model, or refine it to more adequately meet the needs of its multiple and diverse stakeholders.

#### Toward a Minimum National Emergency Response Policy

Members of stakeholder groups and standards promulgation committee members should review existing standards and realistically evaluate best practices to incorporate into acceptable minimum policies and procedures for emergency response. Any procedure adopted should be attainable by any fire service organization required to adhere to it. The procedures adopted are a minimum; any procedure greater in scope may be adopted by those with resources to exceed the minimums.

Elements that need to be included in a model minimum national response policy should include the following:

- Adequate staffing per apparatus and per assignment so as to achieve maximum safety for every emergency responder;
- response to the emergency scene using safe driving techniques, including the required use of seat belts;
- clear rules of engagement for offensive versus defensive strategies;
- incident command using the National Incident Management System (NIMS)<sup>5</sup> (see [www.fema.gov/emergency/nims/index.shtm](http://www.fema.gov/emergency/nims/index.shtm));
- common application and interoperability of accountability systems;

- inter- and intra-operability of communication systems;
- the incorporation of rapid intervention teams (RIT) or companies;
- the incorporation of integrated risk analysis;
- SCBA—zero tolerance policy;
- Inter- and intra-agency training and;
- Mandatory reporting of all Mayday/Close call incidents.

**Recommendation #5:** *The elements of model national response policies will have to navigate skillfully between operational, managerial and cultural forces within the fire service—and community forces including commitment by political leaders.*

## Implementation

Policies and procedures mean little and can become a liability if not adopted and implemented. Many fire service organizations lack the funding and ability to adopt certain standards, yet they can be held to these standards in litigation. Standards must not be written in a way that only a select few can achieve compliance. This is the reason to include policy makers and fire service end-users in the development process. The fire service does not exist in a vacuum.

**Recommendation #6:** *National response policies must be within reach for all fire departments.*

Once minimum standard models are developed and ratified by a representative fire service committee, national buy-in will have to occur at the local and state levels. A divided voice on this issue will almost guarantee that unified national response policies and procedures will not exist. Fire service leaders must be adamant that a national standard cannot be compromised at the local level. Certainly, there will be room for negotiation, but every effort should be made to adopt uniform procedures across the nation. The fire service must not settle for anything less than total commitment to a set of minimum emergency response policies and procedures.

**Recommendation #7:** *Fire service leaders must unite in working toward adoption of minimum emergency response policies and procedures.*

Model minimum response policies will be living documents, subject to interpretation and needing to be routinely re-evaluated. There must be mechanisms in place for validation. Hopefully, these mechanisms will be part of any policies that are eventually promulgated. And it goes without saying, that the fire service must stand up and defend these policies and procedures by widespread affirmation.

## Conclusion

It is imperative for the fire service to implement Firefighter Life Safety Initiative #11, *Develop and champion national standards for emergency response policies and procedures*. The time for the identification and adoption of a national model for emergency response policies has come. We should anticipate resistance along the way. Fire departments across the country are used to developing their own response policies, or have adapted to what has been put forth by the jurisdiction having authority over them. So many variables are associated with fire protection—think about the differences between responding to a structural fire in a small town vs. responding to a wildland fire in the West—that local or regional adaptations to any national policies will be expected.

Industries who have a focus on life safety have established successful models for the development of minimum standards; some with the support of law, others with compliance based on funding, and still others who come to agreement on broad cultural issues. The fire service will certainly benefit from the development of national emergency response policies and procedures, even if they have to be very broad to accommodate the cultures of over 30,000 constituents. This will be a daunting task! Can we do it? Certainly it is possible with the application of tremendous focus, knowledge, and skill. If in the end, we have helped lessen firefighter injuries and fatalities, this Herculean effort will certainly have been worth it.

## Recommendations

**Recommendation # 1:** To get an idea of what a national response standard would be, read F1339-92 (2003) Standard Guide for Organization and Operation of Emergency Medical Services Systems.

**Recommendation # 2:** Identify champions (advocates) at the local level for defending national response policies and procedures—those who stand for innovative and positive changes in the fire service.

**Recommendation # 3:** Recognize that building consensus is a difficult process that often benefits from outside support and facilitation.

**Recommendation #4:** Solicit input from the stakeholders. Existing best practice models and standards should be reviewed and evaluated. Incorporate elements into a minimum practice model.

**Recommendation #5:** The elements of model national response policies will have to navigate skillfully between operational, managerial and cultural forces within the fire service—and community forces including commitment by political leaders.

**Recommendation #6:** National response policies must be within reach for all fire departments.

**Recommendation #7:** Fire service leaders must unite in working toward adoption of a minimum response policy.

## References

- <sup>1</sup> Standard of Cover (2005). Pre-conference workshop. Center for Public Safety Excellence. *Fire Rescue International*. Denver, CO.
- <sup>2</sup> Onieal, D. (1992). Toward a standard of delivery for fire protection services. *Fire Engineering*, 145(9); p. 57-64.
- <sup>3</sup> Ibid., p. 62
- <sup>4</sup> Morrison, G. (2001). Fire staffing and response time mandate looms. Retrieved from <http://www.usmayors.org> .
- <sup>5</sup> National Incident Management System. Retrieved from [www.fema.gov/emergency/nims/index.shtm](http://www.fema.gov/emergency/nims/index.shtm)  
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