

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

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**From:** Ken LaSala [KLaSala@iafc.org]  
**Sent:** Tuesday, July 26, 2011 3:15 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** 063-B - Stakeholder Comment on the National Institute for Occupational Safety and Health (NIOSH) Fire Fighter Fatality Investigation and Prevention Program (FFFIPP)-2011  
**Attachments:** IAFC Comments re FFFIP Program July 2011.pdf

Dear Mr. Moore,

Attached please find the comments of the International Association of Fire Chiefs re: Stakeholder Comment on the National Institute for Occupational Safety and Health (NIOSH) Fire Fighter Fatality Investigation and Prevention Program (NIOSH-063-B).

Please feel free to contact me if you have any questions re: these comments.

Thank you for your assistance!

Ken

Ken LaSala  
Director of Government Relations and Policy  
International Association of Fire Chiefs  
Phone: 703-273-9815 x347



## INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

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July 26, 2011

Paul Moore  
Chief, Fatality Investigations Team  
NIOSH Mailstop: C-34  
Robert A. Taft Laboratory  
4676 Columbia Parkway  
Cincinnati, OH 45226

RE: Stakeholder Comment on the National Institute for Occupational Safety and Health (NIOSH) Fire Fighter Fatality Investigation and Prevention Program (NIOSH-063-B)

Dear Mr. Moore:

On behalf of the nearly 13,000 members of the International Association of Fire Chiefs (IAFC), I would like to thank you for the opportunity to submit comments regarding the NIOSH Fire Fighter Fatality Investigation and Prevention Program (FFFIPP). This program provides an important benefit to America's fire and emergency service and we are grateful for the research that it provides.

Created in 1998, the FFFIPP has conducted over 400 investigations of the deaths of firefighters in the line of duty. NIOSH investigations have made a difference in the fire service by influencing changes in national voluntary consensus standards, improving fire training programs, and enhancing the design and use of firefighting equipment. The NIOSH reports also have been helpful in determining the cause of death of firefighters for the U.S. Department of Justice's Public Safety Officer's Benefits program. Over the years, NIOSH has worked closely with the fire and emergency service to make sure that the FFFIPP is responsive to needs of both fire service personnel and researchers in the field of fire service health and safety.

As firm supporters of the FFFIPP, the IAFC would like to make the following recommendations to improve the program:

- 1) **Expand the program to monitor and possibly investigate non-fatal, but career-ending, cardiovascular events that occur in the fire service.** Sudden cardiac deaths remain a significant source of fire service deaths. The National Fire Protection Association reported that the number of firefighter deaths in 2010 decreased to 72 fatalities, which was a major reduction in the historical annual number of firefighter deaths. However, sudden cardiac deaths accounted for 35

fatalities.<sup>1</sup> The FFFIPP has completed a number of helpful reports outlining the factors that caused many firefighter fatalities by sudden cardiac events. However, the IAFC believes that the FFFIPP also could obtain valuable information by looking at cases where a firefighter suffered from a non-fatal, but still career-ending, cardiovascular event. The comparison between fatal and non-fatal cardiovascular events may identify information that fire chiefs can use to prevent their firefighters from having heart attacks. In addition, the research may identify important physiological or health differences between the survivors and victims of sudden cardiac events that may help fire department physicians identify “at-risk” personnel. We encourage NIOSH to investigate a random sampling of these non-fatal cardiac events as part of their annual investigations.

- 2) **Develop a mechanism that allows external researchers to submit proposals that, if deemed worthy, would provide them access to raw investigative data in order to facilitate further in-depth analysis of the data.** The fire service, health researchers and the general public have all benefitted from the results of the FFFIPP reports. However, considering the relatively small size of the FFFIPP and its large case load, there is not the opportunity to do a comprehensive analysis of some fatalities or compare multiple similar fatalities. The IAFC believes that there should be a mechanism for independent researchers to apply to the FFFIPP to have access to raw investigative data for more in-depth analysis of firefighter fatalities. However, this mechanism should have tight controls to prevent the release of personal or confidential data about the victims. At the very least, a researcher should have to demonstrate well-recognized expertise in the field of firefighter safety or public health; have a well-designed research plan and valid justification for being allowed to access this raw investigative data; should be required to remove the names of the victims or any identifying information about the victims in their research papers; and have a plan to ensure that the results of the research is widely disseminated in the fire service. *Because the population of firefighter deaths is so small, it is vitally important that neither the names of the victims nor any identifying information be released to the public.* The agency may wish to include the stipulation that it can review any paper based on raw investigative data before it is released by the researcher. The IAFC would be interested in working with the NIOSH to develop a safeguard system for this information, if this recommendation was to be implemented.
- 3) **Develop a mechanism to monitor the implementation of recommended changes throughout the fire and emergency services and at departments where an investigation is conducted.** The FFFIPP reports include executive summaries and lists of recommendations to prevent future similar types of

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<sup>1</sup> Fahy, Rita F., et al., Firefighter Fatalities in the United States -2010, National Fire Protection Association, p. 4.

fatalities. The FFFIPP also produces safety advisories to prevent future firefighter fatalities. Unfortunately, no system exists to track whether these recommendations and safety advisories are being implemented. In order to ensure accountability and that the FFFIPP's recommendations are adopted widely, the IAFC recommends that a system be established to monitor the implementation of these safety recommendations by the fire department where the fatality occurred and by the overall American fire and emergency service.

- 4) **Establish a fire service advisory board to work directly with NIOSH and the FFFIPP.** In its 2007 report, the IAFC's Safety, Health and Survival Section recommended the creation of a fire service advisory board to work directly with the NIOSH and the FFFIPP.<sup>2</sup> This board could help the FFFIPP adapt the recommendations of its reports to the techniques, tactics and procedures of fire departments, and better ensure the adoption of the program's recommendations. In addition, the advisory panel could help guide the research of the FFFIPP by representing the community of the program's stakeholders. The advisory panel also could play a role in publicizing the FFFIPP's recommendations to ensure greater adoption of them by the fire service. If the idea of an advisory panel is not practical within the current regulatory and fiscal environment, the IAFC recommends that the FFFIPP hold stakeholder meetings every two years to present important findings from its research to fire service representatives and solicit feedback on ways to improve the program.
  
- 5) **Develop a system/network/organization to collect, analyze and distribute information relating to protective clothing and equipment issues.** The 2007 report also included the recommendation that the federal government should develop a single point of contact that would allow fire departments, fire service organizations, and individual firefighters to report specific difficulties with a piece of safety equipment or protective clothing.<sup>3</sup> The NIOSH currently does post safety advisories about existing pieces of equipment. The NIOSH, the FFFIPP, and National Personal Protective Technology Laboratory should work with representatives from the fire and emergency services and fire service industry to develop a system to share information about protective clothing or safety equipment. The federal agencies would have to review the information that is received, vet it for accuracy, pass it on to the responsible manufacturer and certification organization, and distribute the information to the fire service community. Then, the fire service community could use this system to develop procedures to properly use equipment, upgrade existing technology and equipment, and improve the standards for fire safety equipment and protective gear.

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<sup>2</sup> Recommendations of the Fire Fighter Fatality Investigation and Prevention Program Task Force, International Association of Fire Chiefs' Safety, Health and Survival Section, 2007, p. 9.

<sup>3</sup> *Ibid*, p. 11.

In conclusion, the IAFC is grateful for the opportunity to comment on the FFFIPP. We believe that the program provides a vital resource to the fire and emergency service for reducing firefighter deaths and injuries. We look forward to working with you in a constructive manner to address the recommendations included in these comments. Please feel free to contact Ken LaSala, the IAFC's Director of Government Relations and Policy, at (703) 273-9815 x347, or [klasala@iafc.org](mailto:klasala@iafc.org), to further discuss these recommendations.

Sincerely,

A handwritten signature in black ink that reads "John E. Parow". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

Chief Jack Parow, MA, EFO, CFO  
President and Chairman of the Board