04-04-000



SAFETY, HEALTH AND SURVIVAL SECTION OF THE INTERNATIONAL ASSOCIATION OF FIRE CHIEFS



4025 FAIR RIDGE DRIVE+1 MIREAX, VA 22053 2808 + Tel: 703-273 0911 + www.iafc.org

March 28, 2006

NIOSH Docket Office Robert A. Taft Laboratories M/S C34, 4676 Columbia Parkway Cincinnati, OH 45226

To Whom It May Concern:

On behalf of the Safety, Health and Survival Section of the International Association of Fire Chiefs (IAFC), thank you for your invitation to participate in the NIOSH Fire Fighter Fatality Investigation and Prevention Program (FFFIPP) Stakeholder Meeting on March 22, 2006 in Washington, DC. This letter is intended to be a follow up to that gathering further emphasizing the comments made during that meeting.

As I indicated in my comments, the IAFC is convinced that the FFFIPP is of critical importance in the fire service's overall goal of eliminating needless fire service fatalities. We believe that the objective nature of the investigators and the investigation process itself lend credibility to the program. The fact that the FFFIPP is predominantly scientific in nature provides important data that can be utilized to help the fire service take important steps in changing the safety culture of the American Fire Services.

In terms of recommendations, the IAFC would offer the following:

- Consider renaming the program the "Fire Service" Fatality Investigation Program as this is a more inclusive term and reflects the fact that the fire service experiences fatalities at every level including chief officers, company officers and other positions that may not technically be "firefighters" but are nonetheless members of the fire service.
- Make every attempt to ensure that resources are allocated to investigate a higher number of the fatalities that occur each year that are deemed to be "line of duty," especially those that are traumatic in nature.
- Consider including information in the investigation reports regarding the organizational culture, perhaps utilizing sociologically based assessment instruments.
- Consider the development of informational sessions for Fire Chiefs who would be involved that explain how the investigation process works, perhaps in cooperation with the IAFC.

- Find opportunities as necessary to highlight the connections between the results of the investigations and other organizations such as the National Fire Fighter Near-Miss Reporting System, NFPA, IFSTA and other agencies involved specifically with the analysis and utilization of the data.
- Create regular opportunities to provide feedback on the system, annually or biannually, perhaps in connection with an existing or proposed fire service safety gathering.

In conclusion, I would like to commend those involved at NIOSH in this very important program and pledge the assistance of the IAFC Safety, Health and Survival Section in your future endeavors.

Sincerely,

I. David Daniels

Chair