

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

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**From:** Christopher J. Naum, SFPE [cnaum@twcny.rr.com]  
**Sent:** Friday, July 29, 2011 3:42 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:** PublicComment\_NIOSH\_Docket063.B.Naum.docx  
**Importance:** High

**Attached Stakeholder Comment on the National Institute for Occupational Safety and Health (NIOSH) Fire Fighter Fatality Investigation and Prevention Program (FFFIPP)-2011**

*Please disregard the previously sent attachment sent on 07/29/2011 at 3:14 hrs. ET.*

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July 29, 2011

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**SENT VIA EMAIL: [nioshdocket@cdc.gov](mailto:nioshdocket@cdc.gov)**

**SUBJECT: NIOSH Docket Number 063-B - Stakeholder Comment on the National Institute for Occupational Safety and Health (NIOSH) Fire Fighter Fatality Investigation and Prevention Program (FFFIPP)-2011**

I am taking this opportunity to submit Stakeholder Comments on the National Institute for Occupational Safety and Health (NIOSH) Fire Fighter Fatality Investigation and Prevention Program (FFFIPP)-2011 as referenced on the CDC/NIOSH website,  
<http://www.cdc.gov/niosh/docket/review/docketo63B/default.html>

As a thirty-six year fire service veteran, I am presently directly involved in a variety of multi-disciplined professional venues, capacities and positions of authority or influence addressing a broad range of U.S fire service issues at the local, regional, state, national and international levels. I have served in a variety of capacities as a fire service officer, commander, instructor, author, architect, fire protection engineer, lecturer and subject matter expert. I have direct and broad based expertise in Fire Fighter Safety and Health.

These levels of professional involvement and interaction afford qualitative and quantitative perspectives, insights and dimensions directly related to stakeholder input on the progress and future directions of the Fire Fighter Fatality Investigation and Prevention Program (FFFIPP).

The Fire Fighter Fatality Investigation and Prevention Program (FFFIPP), since its initiation in 1998, has transitioned and evolved into an essential institution and critical resource that continues to be integral towards the unified U.S. fire service goals and objectives of addressing the escalating national problem of occupational fire fighter fatalities and continuous efforts in identifying and promoting fire fighter safety initiatives.

- The FFFIPP continues to meet the expanding needs of the U.S. fire service through the program's Strategic Plan, goals, initiatives and published resources, data and information.
- The U.S Fire Service is positioned for unparalleled transformation directly related to emerging qualitative and quantitative data, research and acumens resulting from governmental and private sector research, analysis, inquiry and examination of past performance, practices, methodologies and challenging paradigms.

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- The resulting expanding demands of the U.S. Fire Service within the areas of incident and operational integrity and excellence with the continued prominent focus on enhancing firefighter safety positions the Fire Fighter Fatality Investigation and Prevention Program (FFFIPP) as a fundamental and essential domain that must be expanded in terms of administrative and operational scope, depth and reach and should be fully funded to meet current and projected fiscal needs.
- Current Investigation Priorities for investigating traumatic LODDs include multiple fatality events, structure fires, motor vehicle incidents, and new or emerging hazards as well as the priorities for investigating medical LODDs include hyper/hypothermia; seizures, diabetes, and drug overdose; physical fitness training; emergency responder training; and sudden cardiac death on the fireground must be maintained and expanded accordingly as emerging or apparent trends or indicators present themselves.
- Since NIOSH does not have current resources to conduct investigations of all fire fighter LODDs, each incident is prioritized using decision logic. These imposed limitations [could] result in missed opportunities from excluded investigations for investigative research, data, insights and recommendations that could further add to the supporting embodiment of knowledge that results from each subsequent FFFIPP investigative report or other supportive publication or research.
- The FFFIPP should expand its ability to increase the number of investigations of fire fighter line-of-duty deaths (LODD) to formulate recommendations for preventing deaths and injuries and should be fully funded, staffed and resourced to promote expanded capabilities in the development and publication of Research, Alerts, Work Place Solutions and Safety Advisories that are integral towards the needs of the U. S. Fire Service.
- The dissemination of findings from NIOSH FFFIPP investigations and inclusive research and data must be promulgated through current and emerging conventional means and methods via presentations at fire service and medical conferences, and expanded through adequate funding and staffing to include eMedia platforms, interactive internet platforms and program and integrated into the emerging integrated social media, eLearning, training and research domains that are changing the manner in which information is presented, communicated and transferred.

The FFFIPP's Strategic Plan identifies numerous instances within the published matrix; NIOSH Fire Fighter Fatality Investigation and Prevention Program (FFFIPP) Progress Report and Proposed Future Directions – 2011, and exemplifies whereby activities, goals or performance measures are noted as having are or may be impacted by fiscal limitations, reductions or elimination.

These impacts will have adverse effects on program integrity and the ability for the FFFIPP to maintain current attentiveness and responsive to its mission and goals and in meeting the demands of the U.S fire Service. The FFFIPP has stated on its web site that the program budget has been stable since the program's initiation in 1998; however, staffing and operating costs have increased.

The FFFIPP further states it is anticipated that this situation will not improve and may further deteriorate over the next few years. Given current efforts to reduce the federal deficit, there is the potential for FFFIPP funding to be reduced.

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- NIOSH FFFIPP funding should be expanded to align with current and projected program needs and aligned with current and projected Strategic Plan activities, goals or performance measures. Furthermore, the FFFIPP Strategic Plan should take aggressive and proactive steps to identify expanded opportunities to increase scope and reach into other areas that may have been restricting based on budget or resources.
- The FFFIPP has stated it proposes to reduce or eliminate attendance at conferences, workshops, training and fire service stakeholder meetings. This will impact NIOSH participation on standard-setting committees such as NFPA technical committees.
- FFFIPP direct participation on national level agency, association, group and special interests should not be restricted or eliminated as this will have a detrimental effect on maintaining and expanding depth, reach and maintaining fundamental and integral relationships, communications channels and networking that is fundamental and core to the FFFIPP Strategic Plan activities, goals or performance measures.
- The FFFIPP's continued presence and participation in various venues and assemblies is considered a fundamental element that has value added benefits and results that contribute to the FFFIPP's effectiveness and importance to the U.S. Fire Service.

### Additional Commentary

#### FFFIPP Priorities for conducting Investigations

- Current Investigation Priorities for investigating traumatic LODDs include multiple fatality events, structure fires, motor vehicle incidents, and new or emerging hazards as well as the priorities for investigating medical LODDs include hyper/hypothermia; seizures, diabetes, and drug overdose; physical fitness training; emergency responder training; and sudden cardiac death on the fireground must be maintained and expanded accordingly as emerging or apparent trends or indicators present themselves.
- Since NIOSH does not have current resources to conduct investigations of all fire fighter LODDs, each incident is prioritized using decision logic. [NIOSH Fire Fighter Fatality Investigation and Prevention Program (FFFIPP) Progress Report and Proposed Future Directions – 2011]
  - These imposed limitations [could] result in missed opportunities from excluded investigations for investigative research, data, insights and recommendations that could further add to the supporting embodiment of knowledge that results from each subsequent FFFIPP investigative report or other supportive publication or research.
  - IF operational restrictions mandate selectivity and discernment in the identification of which fire fighter line-of-duty deaths (LODD) or prominent Near-Miss Event (NME) should be selected for subsequent investigation, THEN the continued decision logic methodology should be used, as it appears based upon published investigative reports that the nature, type, severity, agency type etc., that a well-balanced and representative population of incidents are being investigated and published.

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- The FFFIPP should continue its recent practice of including within its Fire Fighter Fatality Investigation and Prevention Program the identification and investigation of prominent Near-Miss Event (NME). These events, under different circumstances could have apparent or contributing casual factors that could have led to fire fighter line-of-duty deaths (LODD).
- The increased and expanding efforts of the National Fire Fighter Near-Miss Reporting System contribute to the overall goals and objectives shared by both the International Association of Fire Chiefs (IAFC) who manages the program and those of NIOSH FFFIPP in unified U.S. fire service goals and objectives of addressing the escalating national problem of occupational fire fighter fatalities and continuous efforts in identifying and promoting fire fighter safety initiatives.
- The identification and investigation of prominent Near-Miss Event (NME) should continue and be expanded and integrated in the program's Strategic Plan, since the FFFIPP investigative report format and content provides the only resource of its type that presents Near-Miss Event reporting and data that is integral towards a systematic approach towards fire fighter safety and health in an acceptable level of depth and detail.
- The FFFIPP should consider the expansion in its ability to increase the number of investigations of fire fighter line-of-duty deaths (LODD) to formulate recommendations for preventing deaths and injuries and should be fully funded, staffed and resourced to promote expanded capabilities in the development and publication of Research, Alerts, Work Place Solutions and Safety Advisories that are integral towards the needs of the U. S. Fire Service.

### **FFFIPP Investigation Reports Format and Content**

There have been notable improvements to the FFFIPP investigative report format and content of the past couple of years which have contributed towards report consistencies, opportunities for common and comparative analysis of investigative reports, and increased technical basis that directly correlate to the identified recommendations.

It is suggested that the FFFIPP evaluate and consider improvements and enhancements to its reporting template. Although the report follows a prescriptive format; a dynamic layout, the integration of photographic images, computer generated diagrams and interactive hot links ( for the PDF version) can contribute to a suggested user friendly and interactive experience. Enhanced use of sidebars, diagram fields, and other current and generally accepted publishing design practices and elements would greatly enhance the visual appearance and thus potentially contribute towards user appeal.

- It is further self-evident that the investigative reports have been enhanced through the investigation and integration of building construction, occupancy factors and fire behavior considerations. These factors have significant influences on combat fire suppression methodologies and practices when applicable to specific LODD incidents.
- The increasing sensitivity towards fundamental event considerations in building construction and in the aspects of occupancy risk (versus occupancy type) should be promoted and expanded. Incorporating of architectural (building systems, design and construction), fire protection engineering (fire dynamics, behavior and protection systems) is crucial in furthering the technical accuracy and details of an investigative report.

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- Consider integrating enhancements in the area of Human Performance (HU) elements that are consistent with other non-fire service industry practices (Military, Nuclear Power, Airline and Corporate) in the areas of HU.
- Consider alignment with HU performance terminology and common cause factors associated with the National Fire Fighter Near-Miss Reporting System (International Association of Fire Chiefs – IAFC, <http://www.firefighternearmiss.com/>)
- Consider implementation of Fundamental and Conditional Human Performance Tools, Managed Defense and HU Behavioral elements within investigative assessment, analysis and recommendation formulation.
- Integrate the principles of Human Performance Error review process and Managed Defenses
- Consider increased use of Root Cause and Apparent Cause investigative methodologies and processes and integrate these into definable and prominent position statements related to the investigative results. This would provide a level of detail and consistency that eventually over time may provide qualitative and quantitative comparison metrics for further analysis and review.
- Identify clearly defined modes failures and causal factors that may provide direct identifiable, discernable, attainable and feasible corrective actions (CA) to a department, agency or group as a result of the investigative findings. A significant barrier in institutionalizing the effectiveness of the FFFIPP investigative reports and recommendation suggests the somewhat “generic” formulation of recommendations that on occasion are promulgated through the report findings.
- Provide a clearly discernable cross-walk within the investigative report that provides clear and concise identification of key factors associated with such domains as: Building Construction, Occupancy Risk, Systems, Fire Behavior/Dynamics, Incident Command, Operational Methodologies, Risk Management etc.
- Consider direct discernable agency identification in the investigative reporting. Re-examine the legal or agency/programmatic basis for restrictive identification of the agency and department, since in today’s eMedia world, it becomes self-revealing who the affected agency/department is being investigated and reported on. This may contribute towards increased reporting opportunities, reporting transparency and insights previously restricted or limited due to agency conveyances.
- The continued selection and use of Subject Matter Experts (SME) is considered to have significant enhancement to the technical quality and depth of the investigative reporting documents, since it suggests expanded insights and content provided by the external SME in concert with the NIOSH FFFIPP investigators and review team results in a more comprehensive, inclusive perspective with a level of detail not identified in past (non) SME developed reports.

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**FFFIPP Website**

- The web site has a visual look and feel that suggests an “older-outdated” vintage that further suggests users who frequent the web site are used to a certain type of developed web site format, content and navigation that is consistent with recognized industry standards for Content Management System (CMS) style, navigation and site mapping.
- The site lacks the expected dynamic interface expected in some of the most current CMS web sites. Improvements in the site’s interaction, expanded content would further institutionalize the site and its content to the U.S Fire Service
- Increase and enhancement the searchable fields for the investigative reports.
- Implement and assigned enhanced key word searches
- Cross-walk the search capabilities and integration of all the investigative reports in pre-defined fields, categories and terms.
- Consider expanding and integrating dynamic content that is linked directly to web page multi-media, video, audio, etc.

In conclusion, it is recognized with a high degree of esteem and appreciation that the NIOSH Fire Fighter Fatality Investigation and Prevention Program (FFFIPP), since its initiation in 1998, has transitioned and evolved into an essential institution and critical resource that continues to be integral towards the unified U.S. fire service goals and objectives of addressing the escalating national problem of occupational fire fighter fatalities and continuous efforts in identifying and promoting fire fighter safety initiatives.

The Fire Fighter Fatality Investigation and Prevention Program (FFFIPP) continues to expand its influence and effect on the U.S Fire Service and must not only be maintained, but more importantly expanded in its role, responsibility and integration as a defined institution that is mission critical to the U.S Fire Service. Adequate fiscal budgeting, staffing and resource allocations that allow for Fire Fighter Fatality Investigation and Prevention Program (FFFIPP) growth, expansion, improvements and stability are considered indispensable and essential.

Submitted;

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July 29, 2011

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**END OF SECTION**