

Title 19, Division 1, Chapter 13

FINAL STATEMENT OF REASONS

UPDATE OF INITIAL STATEMENT OF REASONS

The Office of the State Fire Marshal (SFM) has provided an update to the Initial Statement of Reasons and recommends approval of the proposed regulatory action.

The State Fire Marshal is proposing to adopt edifications to Sections 1980.00 to 1990.12, which establishes the requirements for administering and managing the "California Fire Service Training and Education Program (CFSTEP)." The proposed regulations as originally noticed to the public includes; the enforcement of these regulations, incorporated references, course development requirements, accredited and approved classes, summative tests, registered instructors, accredited facilities, accountability for facilities and instructors, appeal processes and state fire training fees (California Fire and Arson Training (CFAT) Fund).

The proposed regulations incorporate by reference the administrative procedures for the State Fire Training Division (SFT) and CFSTEP consisting of the following documents as noted in Section 1990.00: "State Fire Training Procedures Manual (January 2015)", "Course Information and Required Materials Manual (May 2015)". This rulemaking would further repeal and eliminate the "Curriculum Development Guidelines (January 2008)" as a referenced document from these regulations. The proposed regulations also incorporate by reference Certification Training Standards Guides based on National Fire Protection Association (NFPA) Standards. The 18 CTS guides incorporated by reference are added to the text of regulations in Section 1990.01. All reference documents are formal publications reasonably available at the Office of the State Fire Marshal (OSFM) or may be accessed on the OSFM's web-site at <http://osfm.fire.ca.gov>.

SPECIFIC PURPOSE AND RATIONALE FOR PROPOSED REGULATORY CHANGES

- 1. Problem being addressed:** The current regulations and adopted references do not address the number of changes that have occurred to the training system as a whole and specifically the changes that have occurred in firefighter training since regulations were first adopted in 2008.
- 2. Anticipated benefits from this regulatory action:** This regulatory proposal benefits the California Fire Service and related stakeholders by clarifying the training requirements in California.
- 3. Factual Basis/Rationale:** Without a clearly defined California Fire Service Training and Education Program, The State Fire Marshal cannot adequately disseminate information regarding the knowledge, skills, and experience necessary for the prevention, control, and extinguishment of fires and other hazards to the emergency response community in California.

The California Fire Service Training and Education Program, has evolved over several decades into a set of formalized rules documented in the State Fire Training Procedures Manual. The California fire service was instrumental in this development and has operated under these rules as the program now exists. The State Fire Marshal is proposing to adopt these rules as mandated by the Administrative Procedures Act. Updating and adopting these rules will provide the State Fire Marshal with the enforcement capabilities to maintain program integrity and credibility.

The legislative intent for establishing the California Fire Service Training and Education Program and the California Fire and Arson Training fund (CFAT), was to provide a self-supporting training infrastructure for California's fire service community.

In 2014, State Fire Training (SFT) accredited 3,380 classes, delivered to 44,058 fire service students attending regional and local training academies across the state. There are approximately 60,000 fire service personnel in 900 fire departments across the state requiring training courses and certification from State Fire Training.

TECHNICAL, THEORETICAL AND/OR EMPIRICAL STUDIES OR REPORTS

The OSFM did not rely on any report or document in the development of this rulemaking beyond that previously identified in the supplement to the Initial Statement of Reasons and in the Second 15-day Notice. In connection with proposing the regulation amendments, the State Fire Marshal also consulted with the Statewide Training and Education Advisory Committee (STEAC), and Training Officer Associations, but these were conversations only and there were no documents relied upon in connection with these consultations.

LOCAL MANDATE DETERMINATION

The proposed regulation does not impose any mandate on local agencies or school districts.

ECONOMIC IMPACT ON SMALL BUSINESS

No commenter proposed an alternative to lessen any adverse economic impact on small business.

SPECIFIC SECTIONS WHICH HAVE BEEN AMENDED AND/OR ADDED SINCE THE PUBLICATION OF THE 45 DAY NOTICE PERIOD.

In response to comments received from the public as well as comments from State Fire Training staff, the State Fire Marshal has updated the original text of the proposed regulations and the incorporated references. The changes were primarily format and editorial, where extraneous language was removed or re-worded, definitions improved, outline numbering updated and repaginated and references clarified.

SECTIONS 1980.00 THROUGH 1990.12. Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some

amendments were added for this section by the OSFM prior to the 15-day public comment period. Reference Sections were inadvertently omitted from previous rulemakings and added to the NOTE for all sections in the text of regulations. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 1980.06(a). Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. The referenced code section 1980.00 was incorrectly identified and was changed to 1990.00. This editorial change more accurately identifies the documents incorporated by reference for the administrative procedures and responsibilities of the Division Chief of State Fire Training. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 1990.00. Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. Editorial changes were made to identify form titles and to re-format the numbering which has no regulatory effect. The "Student Course Evaluation Form (January 2015) was inadvertently omitted from the text of the regulation and added to the list of forms under (a)9 for clarification and consistency with the forms already listed in the SFT Procedures Manual in Section 11, Forms and Checklists. The addition has no regulatory effect. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 1990.02. Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. Editorial changes adding a reference section and amendments to acronyms that were not clearly identified are corrected here to improve clarity for the regulated public. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 1990.03. Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. The edited section provides clarity as to when an instructor must develop an end of course summative test so that student learning/performance can be determined. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 1990.04. Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. The established

process allows instructors to communicate with State Fire Training through email. Email was selected as the most efficient form of communication with SFT staff to encourage instructors to provide updated contact information. This edit provides clarity and has no regulatory impact. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 1990.06. Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. A typographical error was corrected with no regulatory impact. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 1990.11. Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. Information was added to the regulations to provide clarity to the concept of an “update class.” Instructors need to update their profile so that when a curriculum is changed or renewed, SFT staff knows how to notify the instructor for the changes to the curriculum. The inclusion of this information has no regulatory impact on the regulated public as it has been a common policy from the inception of the training division. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 1990.12(c). Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. This section has been eliminated from the regulations as instructors now administer their own retake test. The removal of this fee and renumbering this section has no regulatory effect. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

MATERIALS ADDED TO THE RULEMAKING AS DOCUMENTS INCORPORATED BY REFERENCE: CERTIFICATION TRAINING STANDARDS GUIDES (CTS)

SECTION 1990.01. Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. Previously this section did not clearly identify and list the documents incorporated by reference. The Certification Training Standards Guides (CTS) are added and entered into the rulemaking record as documents incorporated by reference. These guides were developed and based on NFPA (National Fire Protection Association Standards) which are referenced in each guide. Fire fighter job performance requirements are

identified in these Certification Training Standards Guides (CTS). The CTS guides form the basis of all the classes in the SFT system. Prior to the second 15-day public comment period, the SFM considered the necessity of adding the Certification Training Standards (CTS) in the regulation and provided clarity to the text of regulations by listing each of the 18 CTS guides so that members of the fire service can better chart their career pathways. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

The Certification Training Standards Guides based on National Fire Protection Association (NFPA) Standards

The 18 CTS guides that are incorporated by reference are added to the text of regulations in Section 1990.01. Many fire service related classes require updates or require classes to be completely rewritten according to National firefighting standards. The NFPA offers the most complete set of standards for fire fighters. The OSFM references the job performance requirements found in the NFPA standards, but does not adopt the standards in their entirety. Certification Training Standards (CTS) are used in the development of specific classes.

The NFPA documents are made available from the agency, or are reasonably available to the affected public from a commonly known or specified source. It would be cumbersome, unduly expensive or otherwise impractical to publish these documents in the California Code of Regulations. The documents are made available from the agency, or are reasonably available to the affected public from a commonly known or specified source.

THE FOLLOWING AMENDMENTS WERE MADE IN THE SFT PROCEDURE MANUAL (JANUARY 2015) DOCUMENT INCORPORATED BY REFERENCE

SECTION 6.2.3.(C) SFT Procedures Manual (January 2015). Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. The OSFM added procedures to document adding additional classes to an instructor's registration. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 2.2.2.(C) SFT Procedures Manual (January 2015). Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. The OSFM added a FIRESCOPE member to the list of Statewide Training and Education Advisory Committee (STEAC) members. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 6.8.11.5 SFT Procedures Manual (January 2015). Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. The OSFM added Rescue Systems 1 and 2 instructors meet the rank and experience requirements to become registered “Ethical Leadership in the Classroom” instructors. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 7.10.4.7 SFT Procedures Manual (January 2015). Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. The OSFM Added an “S” to “plans” in the title Plans Examiner as a typographic change. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

SECTION 7.10.4.7 Procedures Manual (January 2015). Amendments to this section were not included in the proposed regulation that was originally noticed to the public. Some amendments were added for this section by the OSFM prior to the 15-day public comment period. The OSFM Replaced the language in the original SFT Procedures Manual to “have a minimum of two years of experience in a supervisory/management position.” This language was inadvertently left out in the transfer to the new manual format. The modifications in this section are sufficiently related to the original text so that the public was adequately placed on notice that this change could result.

MATERIALS ADDED TO THE RULEMAKING FILE AS DOCUMENTS RELIED UPON

The Strategic Plan: Blueprint 2020 and Assembly Bill 2917 are entered into the rulemaking record as documents relied upon. These documents were not included in the proposed regulation that was originally noticed to the public but were identified and included by the OSFM in the 15-day public comment period.

1. Strategic Plan: Blueprint 2020

In 2008, stakeholders to the California Fire Training System assembled and developed a new strategic plan entitled “Blueprint 2020.” This strategic plan, available for review at <http://osfm.fire.ca.gov/training/pdf/BP2020finaldraft0108.pdf> identifies, defines, and describes an updated training and education model for the California State Fire Training System. Stakeholders involved in its development represented local, state and federal California career and volunteer fire fighters, fire chiefs, organized labor, training officers, and community colleges in support of and their commitment to the implementation of this strategic plan.

Blueprint 20/20 was developed from an internal needs analysis that identified specific areas of improvement and suggested that systemic change is overdue. These areas include: Quality Control, Data Management, Outdated Curriculum, Certification, Continuing Education, Professional Development, Lack of Innovation, and Understaffing. The actualization of this strategic plan required an update to the regulations as well as the referenced documents: SFT Procedures Manual and the Course Information and Required Materials Manual.

2. Assembly Bill 2917, February 22, 2008, Torrico.

This document was not included in the proposed regulation that was originally noticed to the public but were identified and included by the OSFM in the 15-day public comment period. In 2008, Assembly Bill 2917, Torrico, Chapter 274, filed August 28, 2008, contained requirements for agencies certifying emergency medical technicians to conduct a background check. The background check requirement was outside the scope of capabilities for the OSFM training Division. As a result, the Emergency Medical Technician (EMT) certification program was eliminated and required a complete re-formatting and restructuring of the State Fire Training Procedures Manual.

ALTERNATIVES DETERMINATION

The OSFM has determined that no alternative would be more effective in carrying out the purpose for which the regulation is proposed or would be as effective as and less burdensome to affected private persons than the proposed regulation.

COORDINATION WITH FEDERAL LAW

Federal law is not applicable in this case.

The SFM has summarized and responded to public comments as follows:

SUMMARY AND RESPONSE TO COMMENTS RECEIVED DURING THE INITIAL 45 DAY NOTICE PERIOD OF JUNE 19, 2015 THROUGH AUGUST 3, 2015.

COMMENT NO. 1A: Deputy Chief Steve Drowniany, in a letter dated July 7, 2015.

Mr. Drowniany Commented on section 6.2.8: MAINTAINING PRIMARY INSTRUCTOR STATUS that a process for historical recognition of existing instructors in good standing to add additional courses of instruction should be defined and documented within the proposed procedures. The proposed regulations that outline the process to become a primary instructor are identified in section 6.2 of the SFT Procedures Manual (January 2015). The section describes the course of qualifications, registration, application process, application review, instructor registration appeals process, etc. However the section does not describe the process for existing primary instructors to add courses to the list of courses that they are qualified and certified to teach. Currently, an existing

instructor in good standing is only required to check a box on the current instructor application that states "I am a registered SFT instructor in good standing applying for additional courses only". A Chief's letter validating the applicant's expertise in the coursework with proof of course completion certificate for the course applied for accompanies the application. We are not able to locate this process within the procedures manual.

RESPONSE TO COMMENT NO. 1A:

The Office of the State Fire Marshal agrees with this comment and added language to the SFT Procedures Manual, Section 6.2.3:C documenting the procedure for adding additional classes to an instructor's registration.

COMMENT NO. 1B: Deputy Chief Steve Drowniany, in a letter dated July 7, 2015.

Mr. Drowniany commented that a definition of the requirement to attend any SFT-required update courses should be clarified to add specific intent language to the word "any". The proposed section 6.2.8 #3 states: to maintain primary instructor status a primary instructor must: 1. Abide by all published SFT procedures, 2. Submit any change of personal or professional contact information to SFT, and 3. Attend any SFT-required update courses. By not defining this process of "Attend any SFT-required update courses" within the proposed regulations, we are left with an inability to plan for how our Department can financially support this system. Specific intent language should be added to clarify the word "any."

RESPONSE TO COMMENT NO.1B

The Office of the State Fire Marshal disagrees with this comment as the term "any" is very specific. When course materials are significantly changed and/or updated it will require the instructors of that specific discipline to attend the updated class to stay current in that discipline. These updates are timed with updates to the NFPA standards every 3 to 5 years, and are communicated to instructors, academies, and fire departments in advance as to when the update committees meet to update the curriculum, at least one year in advance of the course approval process.

COMMENT NO. 2A: Instructor Craig Konklin, in a letter dated July 21, 2015.

Mr. Konklin commented on Section 1990.00. It appears that the State Fire Marshal (SFM) has already eliminated curriculum development and is now attempting to codify that change. The proposal states that the SFM "recommends instead curriculum provided by publishers who meet California's training standard." It is not clear to me where these standards are to originate - NFPA, CICC, NWCG, or the publishers themselves. In the past curriculum was developed by technical experts, representing a cross section of California's Fire Service. If this will no longer be the case, the proposed shift cannot help but have a negative impact on the quality of training offered to our

state's firefighters. It would also appear that this change could allow individuals to develop curriculum that may not comprehensively address the subject being taught. This could create potentially dangerous situations. Are safeguards in place to prevent this from occurring?

RESPONSE TO COMMENT NO.2A

The Office of the State Fire Marshal disagrees with this comment. The SFM is no longer developing curriculum (student manuals, instructor guides and supporting media). The cost of both production and the infringement on SFM copyrights in the replication of course materials without compensation, created a net loss to State Fire Training. However, State Fire Training is not abdicating our role in maintaining the standards of our profession. State Fire Training is referencing the standards developed by National Fire Protection Association (NFPA) in the development of our own Certification Training Standards (CTS). The NFPA standards are developed by those in our profession. State Fire Training still relies on subject matter experts to develop the training standards for each course in our system. These experts create course plans based on the CTS. The subject matter experts also review and recommend commercially available published material also based on the NFPA standards.

Individuals and organizations will still have the ability to create curriculum of their own and to go through the peer review process which includes the Statewide Training and Education Advisory Committee (STEAC) and the State Board of Fire Services (SBFS).

COMMENT NO. 2B: Instructor Craig Konklin, in a letter dated July 21, 2015.

Mr. Konklin commented, that the Notice of Proposed Rulemaking and the Initial Statement of Reasons offer that the proposed changes will not create "Other non-discretionary cost or savings imposed upon local agencies" and that "There is no direct cost impact anticipated as a result of these regulations." It is undeniable, that with the SFM no longer creating curriculum, the costs associated with that task must be borne elsewhere. This will most likely fall upon local government and private businesses engaged in fire training specifically fire department training bureaus, community colleges, and individual instructors.

It was my understanding based on comments made during outreach meetings, that the cost of curriculum development was a factor behind the SFM's move to discontinue that activity. I believe the statements that the proposed changes are cost neutral for state government; local government and private business are erroneous. Likewise the similar statements in the Economic Impact and Analysis and Assessment are also in error.

RESPONSE TO COMMENT NO. 2B

The Office of the State Fire Marshal disagrees with this comment. State Fire Training still bears the cost for curriculum development. The funding for curriculum development comes into the California Fire Arson Training Fund (CFAT) from the money generated

by registration and certification fees. State Fire Training is still actively involved in the process of establishing the training standards and pays for editors and the travel expenses to have subject matter experts come together to work on certification development processes. State Fire Training is no longer publishing the material being developed and is instead posting training standards documents to the internet. Older State Fire Training curriculum (Instructor Guides, Student Manuals, and multi-media) are also now published to the website.

In the past, State Fire Training charged host agencies or instructors the cost to reproduce and ship course materials. At the time student manual prices ranged from \$15, to \$65, Instructor Guides ranged from \$35 to \$150, and multi-media CD's were available for \$85 to \$100. In many cases it was costing State Fire Training more to reproduce and ship this material than what State Fire Training was bringing in by the way of items sold. Many Instructors and academies were no longer ordering course material with their classes but opted instead to reproduce previously purchased material creating a loss in revenue for State Fire Training.

State Fire Training considered the cost of producing and distributing course materials in-house and recognized that the national publishers provide a superior product at the same relative cost. The national publishers also have a vested interest in keeping course materials up-to-date and current with the national standards (a past criticism of State Fire Training materials) . For these reasons, State Fire Training considered that the cost to academies, instructors and students to be equal to the cost of purchasing up-to-date materials from the publishers.

COMMENT NO. 2C: Instructor Craig Konklin, in a letter dated July 21, 2015.

Mr. Konklin commented on section 1990.02 Accredited and Approved Course Curriculum and Course Certificate. I would like clarification on what curriculum and testing standards will be applied to FSTEP classes that count toward certification under the California Incident Command Certification System. Will instructors be required to adhere to NWCG curriculum and standards (including testing)? Likewise, will the Fireline Safety Awareness for Hired Vendors instructors be provided curriculum by CAL FIRE/USFS and will the skills test still be mandated? I ask these questions because the language in the proposed changes makes it unclear as to whether the SFM or the instructor will be responsible for deciding course content and if a proficiency demonstration is required. If no protections exist, would it be possible to specify that training leading to any CICCS or other fire line certification meet a minimum standard determined by the wildland fire agencies?

RESPONSE TO COMMENT NO. 2C

The Office of the State Fire Marshal disagrees with this comment. As indicated in Title 19 California Code of Regulations, State Fire Training does not require a test at the end of a Fire Service Training and Education Program (FSTEP) class which includes the courses offered by the National Wildfire Coordinating Group (NWCG). While State Fire Training does not require testing at the end of the FSTEP classes, that policy does not preclude an instructor from developing and administering a test at the end of an FSTEP course. Currently State Fire Training is aligned with the NWCG Incident Command System courses. The "Fireline Safety Awareness for Hired Vendors" training is developed in collaboration with CAL FIRE/USFS and administered by State Fire Training using registered SFT instructors. The content for the FSTEP courses are determined by the agency providing the curriculum and not the instructor.

OFFICE OF THE STATE FIRE MARSHAL (OSFM) STAFF COMMENTS FROM A STATEWIDE TRAINING AND EDUCATION ADVISORY COMMITTEE (STEAC) MEETING JULY 31, 2015:

OSFM staff comments from STEAC meeting regarding the documents incorporated by reference-State Fire Training Procedures Manual:

STAFF COMMENTS

Section 2.1.2 . OSFM staff commented that Membership "Firefighting Resources of California Organized for Potential Emergencies" (FIREScope) in the State Fire Training Procedures Manual should be added as a member organization to STEAC.

RESPONSE TO COMMENT:

Section 2.1.2:C . The Office of the State Fire Marshal agrees with this comment and added FIREScope to the list of STEAC members in Section 2.1.2:C. **DELIVERED IN MARKED-UP PAGES IN SFT PROCEDURES MANUAL.**

STAFF COMMENTS

Section 6.8.11.5. The OSFM staff commented in the State Fire Training Procedures Manual that rescue systems 1 and 2 instructors do in fact meet the rank and experience requirements to become registered "Ethical Leadership in the Classroom" instructors. The strike out language corrects this misprint.

RESPONSE TO COMMENT:

The Office of the State Fire Marshal agrees with this comment. The language was erroneously added in the development of this SFT Procedures Manual. The erroneous material was struck-out and has no regulatory impact. **DELIVERED IN MARKED-UP PAGES IN SFT PROCEDURES MANUAL.**

STAFF COMMENTS

Section 7.10.3. The OSFM staff commented in the State Fire Training Procedures Manual that an “S” needs to be added to “Plans” in the title for Plans Examiner.

RESPONSE TO COMMENT:

The Office of the State Fire Marshal agrees with this comment. The correction is a non-substantial edit. **DELIVERED IN MARKED-UP PAGES IN SFT PROCEDURES MANUAL.**

STAFF COMMENTS

Section 7.10.4.7 (Fire Marshal) Experience. OSFM staff commented that the State Fire Training Procedures Manual was missing language and added back the original language to “*have a minimum of two years’ experience in a supervisory/management position.*” This language was inadvertently left out in the transfer to the new manual format.

RESPONSE TO COMMENT:

The Office of the State Fire Marshal agrees with this comment and replaced the original language which has no regulatory impact. **DELIVERED IN MARKED-UP PAGES IN SFT PROCEDURES MANUAL.**

SUMMARY AND RESPONSE TO COMMENTS RECEIVED DURING 15-DAY NOTICE PERIOD OF MODIFIED TEXT FROM SEPTEMBER 25, 2015 THROUGH OCTOBER 10, 2015.

COMMENT NO. 1: Taral Brideau in an email dated October 7, 2015.

Taral Brideau commented that in the SFT Procedures Manual the acronym for the California Fire Fighters Joint Apprenticeship Committee in the glossary is incorrect and instead of CFFJAC it should be CAL-JAC.

RESPONSE TO COMMENT NO. 1:

The Office of the State Fire Marshal agrees with this comment and corrected the acronym in the acronym glossary on page 3 as well as in Section 2.1.2 C: Membership located in the State Fire Training Procedures Manual. The edification has no regulatory impact.

SUMMARY AND RESPONSE TO COMMENTS RECEIVED DURING THE SECOND 15-DAY NOTICE PERIOD OF MODIFIED TEXT FROM APRIL 27, 2016 THROUGH MAY 12, 2016.

The second 15-Day modified text was made available to the public from April 27, 2016 through May 12, 2016. The OSFM received no further comments during that period.

ADDENDUM TO FINAL STATEMENT OF REASONS

**Office of the State Fire Marshal
Title 19, Division 1, Chapter 13**

Fire Fighter Training and Certification

ALTERNATIVES DETERMINATION

The State Fire Marshal has determined that no reasonable alternative it considered to the regulation or that has otherwise been identified and brought to its attention would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action described in the Notice, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.