



2024 Fall NSFA Publication

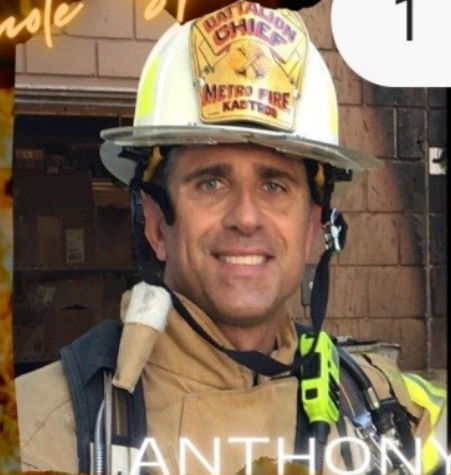
- Fire service over the years and NSFA today
- Meet your Board of Directors
- OSHA NSFA Review and Response
- NVFC OSHA review FAQ
- Fire Shows West Sept 23-25
- 2025 NSFA Conference Fallon NV
- Many new articles
- A couple articles from the past

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Fire Service over the years and NSFA Today

In the fire service we are continually evolving. Many reading this have many years in the fire service. Many are new to the fire service.

There is one common denominator, we are all firefighters.

Ben Franklin founded the Union Fire Company December 1736. This was the first formally organized all volunteer fire company.

Over the generations the fire service are brothers and sisters, volunteer, career and combination departments.

What grew from 1736 (248 years ago) are Firefighters, EMTB, AEMT, EMTP, Wildland, and whole array of certification's that take us to extreme altitudes and below the water's surfaces. A Fire Service that was once a "Bucket Brigade" has grown to highly trained individuals working as a team to protect life and property.

It is easy to believe the oath our brothers took in 1776 is honored the same by every brother and sister who take our oath today.

Your Nevada State Firefighter Association (NSFA) support volunteer and career Nevada firefighters. NSFA offers its members many benefits for individual development in life as well as developing your firefighter / EMS skills.

Please read all the information in this Pumper about the OSHA review by your NSFA board and the NVFC board

2025 NSFA conference will be hosted by Fallon FD in Fallon NV

Look over the NSFA website www.NSFA.org for much more information NSFA offers you as a member.

Tell your brothers and sisters from you neighboring departments about your NSFA benefits. We can help them like we help you



A fireman knocked at the heavenly gate
His face was scarred and old
He stood before the man of fate
For admission to the fold.

"What have you done," Saint Peter said,
"To gain admission here?"
"I've been a firefighter, sir," he said
"For many, many years."

The Pearly Gates swung open wide,
As Saint Peter touched the bell.
"Come in and choose your harp, my son,
You've seen your share of hell."

- Author Unknown

Susan Corbin 2012



NEVADA STATE FIREFIGHTERS' ASSOCIATION

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**Position Paper and Formal Response to
The Proposed Ruling and Comment Period for the
OSHA Regulation derived from
29 CFR 1910.156**

On this date:

July 20, 2024

As issued by

The Board of Directors of the Nevada State Firefighters' Association

In the 1980's when OSHA began to promulgate 29 CFR 1910.156, also known as The Fire Brigade Standard it was a much-needed effort to increase firefighter safety. There is no denying that this effort has benefited firefighter safety and health and saved lives. Equally the burden and load lifted by budgets and planners has been immense in getting the profession of fire protection to this level in 2024.

Although the Nevada State Firefighters Association fully supports safety and training standards, they must be defined, obtainable and fully funded. Benjamin Franklin organized the Union Fire Co. in Philadelphia in 1736 as the

first fire department in the United States. As a volunteer department, their intent was to protect the citizens of their community. Nevada, like most states around our country, is struggling to recruit and retain volunteer firefighters as it is. Let us not take the history and dedication of these selfless individuals by implementing regulations that are either potentially impossible or financially prohibitive to attain.

It should be recognized that there are approximately 29,452 fire departments in our country. Of these, 18,873 are all volunteer, 5,335 are mostly volunteer, 2,459 are mostly career and 2,785 are fully career departments.

In January 2024, a document was circulated that proposed a re-write to 29 CFR 1910.156 and a short 90-day public comment period began with a short extension ending June, 2024. The new document, changes the requirements of the authority having jurisdiction (AHJ) in protecting their responders. The changes are immense, as is the 600 plus page document itself. The Nevada fire service struggles, however, with some of the details in the proposed document. Implementation of this proposed regulation could be catastrophic for some Nevada Emergency Service Organizations (ESO) and will be a major impact to all departments. A major part of OSHA's directive is to formulate a standard that is economical and feasible. We have major questions and concerns that large portions of the proposed standard do not fall within those guidelines. The below offers a brief glimpse and synopsis of our concerns.

Primary Concerns

1. As is stated in the proposed ruling on numerous occasions, the application of these

changes is left up to the states, which have OSHA programs, to adopt and enforce.

Specifically at issue, and referenced, is the application to volunteers. The federal premise is that the regulation applies only to employees. As Nevada is an OSHA Plan state, volunteer ESO's have been viewed as employer/employee

relationships and thus the standard presumably will apply. Our understanding would be that this regulation will apply to all fire departments within our state, equally. Contents of the proposed standard will have major budgetary impacts to all departments in our state, in particular volunteer and small combination departments.

2. As stated above, major financial infusions will be required in Nevada to fund the proposed regulation as offered. Personnel simply do not exist to comply with a

number of the administrative functions as prescribed in the new regulation.

limitations on local government in the raising of taxes to fund any operation.

The

application of the new costs associated with the proposed 29 CFR 1910.156 will only be able to be absorbed by the fastest growing communities, typically represented fully paid departments. This will leave the majority of ESO's in Nevada with no effective way to fund this proposed regulation.

4. As such, an alternative will be for local government to live outside of an OSHA

regulation, knowingly; or to close the departments in question to prevent liability

and risk. The burden of this choice will be placed squarely on the local governing body and in most cases, local government/county cannot legally raise taxes to cover this cost.

5. The proposed standard specifically requires data and record keeping functions that may or may not exist in some fire departments. For instance, one measure that may be implemented but currently not required is stated: Paragraphs

(d)(1) and (2) of the proposed rule would require the ESO to develop and implement

a written ERP that provides protection for each of its responders designated to operate at an emergency incident. {ESO=Emergency service organizations, ERP= emergency response plan}

An example of other types of documentation processes currently not mandated but

would be required to be updated annually are:

a. Exposure Documentation: Proposed paragraph (g)(3)(ii) would require the ESO to document each exposure to combustion products for each responder, for the purpose of determining the need for the medical surveillance as specified in (g)(3)(i)(A), and for inclusion in the responder's confidential record, as required in (g)(1)(ii).

b. Pre-incident Plans: Paragraph (d)(4) of the proposed rule would require the ESO, as part of the community or facility vulnerability assessment, to identify each structure and other location where a PIP is needed. Proposed paragraph (m) provides additional information and proposed provisions for developing PIPs, which would be used by responders at emergency incidents as discussed further in proposed paragraph (p). Whereas the Association acknowledges the need for planning and its value, again; the issue has never before been mandated and would require departments to begin a formal program. {PIP=Pre-incident plan}

c. Risk Management Plan: Paragraph (f)(1) of this proposed rule would require

ESOs to develop and implement a written comprehensive risk management plan based on the type and level of service(s) that would be established in proposed paragraphs (c) and (d) of the proposed rule.

d. Vulnerability assessment plan: Proposed paragraph (d)(3) would require that the ESO conduct a community or facility vulnerability assessment of hazards within the primary response area where the emergency service(s) it provides is/are expected to be performed. An in-depth assessment of the community or facility would determine specific vulnerabilities. The ESO would

be able to determine what resources are available for mitigation, both within the ESO and from mutual aid with ESO's, and whether the available resources are sufficient for mitigating the identified vulnerabilities.

e. Vacant Structures: Proposed paragraphs (d)(4)(i) and (ii) would further require that the community or facility vulnerability assessment identify each vacant structure and location that is unsafe for responders to enter due to conditions such as previous fire damage, damage from natural disasters, and

deterioration due to age and lack of upkeep; and would require the ESO to

provide a means for notifying responders of the vacant structures and unsafe

locations. Again, this is of value but would require the hiring of personnel to

complete the task and maintain currency.

6. The Medical and Physical requirements listed in the proposal will have a significant

impact on the fire service community. The following are a few of the major concerns:

- Emergency Services Organizations (ESO) are to ensure that, prior to performing

emergency response duties, each team member and responder is medically

evaluated to determine fitness for duty by a physician or other licensed health

care professional (PLHCP) at no cost to the team member or responder and at a

reasonable time and place. This is going to be cost prohibitive to most small and

volunteer departments as the level of funding is not there. NFPA 1582 states that the physical, and all components required, must be provided at no cost to the member. This

includes any medical evaluations and any medical tests ordered by the

department physician. These must be conducted upon entry prior to training

which is the established baseline and annually thereafter according to NFPA

1582 Chapter 7.1.2. This is a new regulated expense.

- The specified elements that must be included in all medical evaluations (NFPA

1582), regardless of the tier or level of service the member provides will eliminates many members who are not engaged in the initially dangerous to life

and health (IDLH) operations such as drivers and EMS providers. In staffing

strapped departments, this too will further hamper operations.

- OSHA has preliminarily determined that an action level of 15 or more exposures

per year is an appropriate threshold for triggering medical surveillance to detect

and prevent adverse health effects from combustion products. This is far more

encompassing than just emergency scenes but would include such areas as

exposure to diesel fumes in an apparatus bay. Using this formula, if a firefighter

goes to 15 fire calls in a year, they would be required to enter into further medical

surveillance, under a medical team's care.

- The requirement to provide behavioral health and wellness resources at no cost

to the team member or responder or identify where resources are available at no

cost in their community but unfortunately impractical in Nevada. In rural settings, this most likely is not available without substantial travel distances for

resources. The cost would include not only treatment but also travel. Most rural

departments are volunteer and would not have funding for this.

- The proposed regulation requires provision of exercise training to volunteers. As

volunteers are not on a regular, prescribed work schedule; how will this be

accomplished?

7. The proposed regulation specifically states: The scope of the proposed rule is larger,

expanding beyond employers who provide only firefighting services to include

employers that provide other emergency services, such as pre-hospital EMS and

technical search and rescue services. As such, application of this particular

standard will now encompass and open the door to many more avenues within

departments providing both fire and EMS responses. As such, further time for

review and delineation of the effects is requested.

8. Under the proposal, the ESO's procedures for use of privately owned vehicles (POV)

in these circumstances, would need to include the same elements as those for

driving department owned emergency vehicles, including requirements for wearing

seatbelts, speed limits, stopping and proceeding at traffic control devices, passing

other vehicles, and the use of warning lights and signals. And though superficially

this would sound logical; this would require all POVs that respond to have lights and

sirens. This is not current standard practice. The proposed change will be significant due to the regulation being now applied to private / personal property. At

what level would the local governing body want to have an individual's POV

recognized as part of the emergency response apparatus pool and thus assume the

liability for all firefighters POVs?

9. One question posed under the comment period description is as follows and is

representative of the direction and flavor for much of the document, and possibly

its derivation: (e)-1. OSHA is considering adding to both paragraphs (e)(1) and (2) a

requirement to permit employee representatives to be involved in the development

and implementation of an ERP, and to paragraph (e)(4) a requirement to allow employee representatives to participate in walkaround inspections, along with team

members and responders, and is seeking input from stakeholders on whether employee representative involvement should be added to paragraph (e). Nevada is a "right to work" state and as such feels this requirement is an encroachment on that right and should be deleted or further justified. The value of employer knowledge in programs is paramount, yet participation in their development is not and could be most likely outside of the scope of expertise for the employee. Train all in the safety concerns of an emergency plan, but do not require untrained persons to create the plan merely to mandate "employee representative" status to be recognized.

10. The updating of facilities to comply with the standard will financially impact local

governments severely. Again, safety concerns are warranted, but the impact to

local, possibly volunteer systems, should be noted. For instance: Proposed paragraph (j)(1)(ii) would require the ESO to provide facilities for decontamination,

disinfection, cleaning, and storage of PPE and equipment. This does not exist in

many fire departments today.

11. Staffing at emergency scenes as described in the proposal is vague at best and

dangerous at worst. It leaves vague the intent of enforcement on those systems

which are volunteer or that have limited paid personnel that is very prevalent in

Nevada. As stated: Operations on the incident scene would need to be limited to those that can be safely conducted by the team members or responders on the scene. Although stated to the contrary, this clearly enters the debate of minimum staffing that the Association feels is best handled by the local governing bodies having jurisdiction. And, if not, the document clearly states that: ensure that operations are limited to those that can be safely performed by the team members and responders available on the

scene -thus clearly opening the door to counter guess every initial commanding officer and strategies and tactics.

NFPA Standard References

Of great concern, and new to the process, is the formal recognition of twenty-three (23)

NFPA and ANSI standards, in whole or in part, which are to be incorporated by reference into

the new proposed rule - 1910.156.

- NFPA 1001, Standard for Structural Fire Fighter Professional Qualifications, 2019 ed.
- NFPA 1002, Standard for Fire Apparatus Driver/Operator Professional Qualifications, 2017 ed.
- NFPA 1005, Standard for Professional Qualifications for Marine Fire Fighting for LandBased Fire Fighters, 2019 ed.
- NFPA 1006, Standard for Technical Rescue Personnel Professional Qualifications, 2021 ed.
- NFPA 1021, Standard for Fire Officer Professional Qualifications, 2020 ed.
- NFPA 1081, Standard for Facility Fire Brigade Member Professional Qualifications, 2018 ed.
- NFPA 1140, Standard for Wildland Fire Protection, 2022 ed.

- NFPA 1407, Standard for Training Fire Service Rapid Intervention Crews, 2020 ed.
- NFPA 1582, Standard on Comprehensive Occupational Medical Program for Fire Departments, 2022 ed.
- NFPA 1910, Standard for the Inspection, Maintenance, Refurbishment, Testing, and Retirement of In-Service Emergency Vehicles and Marine Firefighting Vessels, 2024 ed.
- NFPA 1951, Standard on Protective Ensembles for Technical Rescue Incidents, 2020 ed.
- NFPA 1952, Standard on Surface Water Operations Protective Clothing and Equipment, 2021 ed.
- NFPA 1953, Standard on Protective Ensembles for Contaminated Water Diving, 2021 ed.
- NFPA 1971, Standard on Protective Ensembles for Structural Fire Fighting and Proximity Fire Fighting, 2018 ed.
- NFPA 1977, Standard on Protective Clothing and Equipment for Wildland Fire Fighting and Urban Interface Fire Fighting, 2022 ed.
- NFPA 1981, Standard on Open-Circuit Self-Contained Breathing Apparatus (SCBA) for

Emergency Services, 2019 ed.

- NFPA 1982, Standard on Personal Alert Safety Systems (PASS), 2018 ed.
- NFPA 1984, Standards on Respirators for Wildland Fire-Fighting Operations and

Wildland Urban Interface Operations, 2022 ed.

- NFPA 1986, Standard on Respiratory Protection Equipment for Tactical and Technical

Operations, 2023 ed.

- NFPA 1987, Standard on Combination Unit Respirator Systems for Tactical and

Technical Operations, 2023 ed.

- NFPA 1990, Standard for Protective Ensembles for Hazardous Materials and CBRN

Operations, 2022 ed.

- NFPA 1999, Standard on Protective Clothing and Ensembles for Emergency Medical

Operations, 2018 ed.

ANSI/ISEA

Additionally, provisions exist in the proposed standard which draw from, or are consistent with, the

following NFPA standards, but these standards are not proposed to be incorporated by reference:

- NFPA 10, Standard for Portable Fire Extinguishers, 2022 ed.

- NFPA 600, Standard on Facility Fire Brigades, 2020 ed.
- NFPA 1201, Standard for Providing Fire and Emergency Services to the Public, 2020

ed.

- NFPA 1451, Standard for a Fire and Emergency Service Vehicle Operations Training

Program, 2018 ed.

- NFPA 1500, Standard on Fire Department Occupational Safety, Health, and Wellness

Program, 2021 ed.

- NFPA 1521, Standard for Fire Department Safety Officer Professional Qualifications,

2020 ed.

- NFPA 1561, Standard on Emergency Services Incident Management System and

Command Safety, 2020 ed.

- NFPA 1581, Standard on Fire Department Infection Control Program, 2022 ed.

- NFPA 1660, Standard for Emergency, Continuity, and Crisis Management: Preparedness, Response, and Recovery, 2024 ed.

- NFPA 1700, Guide for Structural Fire Fighting, 2021 ed.

- 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, 2020 ed.

- 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, 2020 ed.

- NFPA 1851, Standard on Selection, Care, and Maintenance of Protective Ensembles

for Structural Fire Fighting and Proximity Fire Fighting, 2020 ed.

- NFPA 2500, Standard for Operations and Training for Technical Search and Rescue

Incidents and Life Safety Rope and Equipment for Emergency Services, 2022 ed.

Numerous NFPA standards listed in the OSHA document are slated for consolidation of

listed standards that have not been placed into existence at this time which could mean

that these standards could and probably will change. OSHA recognizes NFPA's ongoing efforts

to consolidate the following standards, and intends to recognize the latest status of consolidation in the final rule:

- NFPA 1001, NFPA 1002, NFPA 1003, and NFPA 1005 will become NFPA 1010, Standard

for Firefighter, Fire Apparatus Driver/Operator, Airport Firefighter, and Marine

Firefighting for Land-Based Firefighters Professional Qualifications, scheduled for 2024.

- NFPA 1021 and other standards will become NFPA 1020, Standard for Fire Officer and

Emergency Services Instructor Professional Qualifications, scheduled for 2025.

- NFPA 1407, NFPA 1451 and other standards will become NFPA 1400, Standard on Fire

Service Training, scheduled for 2026.

- NFPA 1581, NFPA 1582 and other standards will become NFPA 1580, Standard for

Emergency Responder Occupational Health and Wellness, scheduled for 2025.

- NFPA 1201, NFPA 1710, NFPA 1720, and other standards will become NFPA 1750,

Standard for the Organization and Deployment of Fire Suppression Operations,

Emergency Medical Operations, and Providing Fire and Emergency Services to the

Public, scheduled for 2026.

- NFPA 1981, NFPA 1982 and other standards will become NFPA 1970, Standard on

Protective Ensembles for Structural and Proximity Firefighting, Work Apparel and Open Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services, and Personal

Alert Safety Systems (PASS), scheduled for 2024.

- NFPA 1951, NFPA 1977, and NFPA 1999 will become NFPA 1950, Standard on Protective

Clothing, Ensembles, and Equipment for Technical Rescue Incidents, Emergency Medical

Operations, and Wildland Firefighting, and Urban Interface Firefighting, scheduled for

2025.

- NFPA 1952 and NFPA 1953 will become NFPA 1955, Standard on Surface Water

Operations Protective Clothing and Equipment and Protective Ensembles for Contaminated Water Diving, scheduled for 2025.

- NFPA 1984 and NFPA 1989 will become NFPA 1985, Standard on Breathing Air Quality

for Emergency Services Respiratory Protection and Respirators for Wildland Firefighting

and Wildland Urban Interface Operations, scheduled for 2026.

The new regulation fully recognizes that many of these NFPA standards are changing, and

part of the concern, and thus this detailed listing, is the fact that these consensus

standards will forever change. That is good for currency but difficult for planning and

education. The costs of simply keeping up, and the greater need now to fully participate in

the standards development, will also require greater attention and funding. Much

conversation should occur before regulation adoption as to the direction of standards on

items such as personal protective clothing (PPE), which are driven by manufacturers and

how that new direction will impact budgetary planning and department risk in meeting the

new regulation.

Formal Request to the Proposed Standard

We respectfully request that OSHA consider the below items, and allow representatives from Nevada a seat at the table as various national delivery systems collectively work in collaboration on a solid plan that will improve emergency responder safety in both an economical and technical fashion.

1. Extend the public comment period until the below items are addressed and

managed. The 608-page document released is extensive and requires time to

unpack and digest.

2. The Nevada State Firefighters' Association (NSFFA) is requesting the launch

of a blue-ribbon panel of industry stakeholders that could further digest the proposed standard and offer input on the plan. The proposed plan itself requires

ESOs to include the rank-and-file responders as part of the planning process.

Shouldn't those same responders have representation in the process that will

dictate how they do business?

3. The NSFA is requesting, prior to adoption, the allowance of the nine (9) major Fire

Service Organizations, previously utilized in the Assistance to Fire Act Grants

process; have a seat at the table in an in-person public hearing to explain face-to-face the impacts and challenges both operationally and economically that may be

faced by their respective members and organizations represented.

4. The NSFA is requesting that prior to adoption, the creation of a summit to allow

one (1) designated Fire Service Representative from all 50 states to be a part of the

discussion group for the revision of this standard. Too little has been heard from

affected states as to the contents and implementation of the regulation.

5. The NSFA requests to remove the 23, included by reference, NFPA standards and

instead bring the intended specific requirements into the standard itself. The

current model of incorporation by reference (IBR) has several concerns.

a. Using the IBR model, an AHJ is forced to purchase information to comply

with the standard. The NFPA standards are available for free viewing, but to

be able to understand them, an agency needs to be able to digest them,

mark them up, and distribute to others within the organization for

collaboration. This could not be done without using backdoor methods or

paying for each referenced standard at around \$100 a piece or a subscription

that could cost up to \$1700 per year.

b. There are over 1500 “shalls” and “musts” in these documents. The pure

volume of understanding those and analyzing if your AHJ meets the intent is

staggering.

c. Some of the NFPA standards that are IBR to fire departments covered by the

rule, are not meant for all responders when you look at the standard's scope

or purpose. For example, NFPA 1002's scope and purpose is for the operation

of fire apparatus. EMS and many specialized response agencies are not fire

departments and do not have any "fire apparatus" but still drive response vehicles. Either the rule requires some first responders to comply with a standard that in its first chapter says it does not apply to them, or it creates a

capricious double standard within the proposed rule.

6. The NSFA is requesting that federal OSHA revisit the definitions of volunteer and

employee and help all affected agencies understand who is covered and to what

level. An emergency does not become any more dangerous in various locations and

yet this standard treats a first responder in Nevada much differently than one

in another part of the United States.

7. The NSFA request that prior to adoption, federal OSHA formulate greater state

OSHA system flexibility within the federal regulation; for the adoption and

implementation process within each state.

Summary

OSHA has done an outstanding job in documenting the need for change. The NSFA has

great concern with some of the details in the proposed standard and the impact these

will have on the communities especially in rural America, and Nevada as it has the

potential to see our volunteer departments be pushed into non-existence due to an

unachievable regulation which will impact the economy of the United States and the

quality of life in those communities. It would be the hope of the Nevada State

Firefighters' Association that OSHA would institute further review and allow greater

stakeholder participation in the process. At the very least, the federal regulation should

openly and clearly state the flexibility that state OSHA programs can have and will be

allowed in the adoption of this ruling when final.

Michael D. Heidemann

Michael D. Heidemann

Executive Director – Nevada Firefighters Association

NEVADA STATE

FIREFIGHTER'S



ASSN.



Frequently Asked Questions about the OSHA Proposed Rule

Disclaimer:

We have received several requests for a 30,000-foot view of what would be required for an Agency Having Jurisdiction (AHJ) to comply with the proposed 1910.156 standard. While this list is not comprehensive, it is our best understanding of what would be required under the standard if adopted, as written, today. Please pay special attention to the NFPA standards referenced, as they contain over 1,500 “shalls” and “musts” that would be required under this law. While the standard is very detailed, it is also very vague on exactly what would meet the standards. These details would be decided by individual inspectors and court cases moving forward. This review is not a legal opinion in any way, shape, or form, or reflect the opinion of any business or organization. This is strictly the review of a few folks that have spent hundreds of hours pouring through the proposed standard since it was announced in December 2023.

Summary

On February 5th, 2024, the Federal Occupational Safety and Health Administration published a proposed rule that would update the 29 CFR 1910.156 “Fire Brigade” standard that was first published in 1980. This proposed rule would replace the existing rule and expand the scope of it from the original small-scoped fire responder rule to now set board standards that apply not just to industrial firefighters but would now also apply to employees engaged in fire service activities, emergency medical services, and specialized rescue services.

Who would it apply to?

All private services would be subject to this rule as well as any public or governmental entity if you are in a jurisdiction where OSHA is applied to you (OSHA program states and municipalities).

“Employees” of any agency engaged in the above activities. While many volunteers are not viewed as employees by states and the federal government, many states do

consider volunteers to be employees. Also, volunteers that receive pension plans or other substantial remuneration may qualify as employees under the rule. Refer to your jurisdiction or counsel to learn whether your volunteers would be considered employees.

Examples of agencies that would need to comply that did not under the old rule include: Private EMS services, Law enforcement rescue teams such as SAR, and water rescue teams.

What does it the proposed rule require?

Here is a very general overview, refer to the proposed rule for specifics:

Establish a comprehensive Emergency Response Plan (ERP) that provides protections for responders who are designated to work at incidents. It shall include, but not be limited to:

- Team members responsibilities and participation based on role and capability
- Comprehensive risk management plans
- Medical and physical requirements
- Training
- Facility preparedness
- Vehicle preparedness and operation
- Pre-incident planning
- Incident management system use
- Emergency incident operations
- Standard operating procedures
- Post-incident analysis
- Program evaluation
- Updated copies of all written policies and procedures

The ERP must also include a comprehensive community vulnerability assessment for the agency's response area identifying:

- Hazards within the jurisdiction
- Places, structures, facilities, and other locations requiring regular pre-incident planning
- An ongoing listing of locations that are vacant and a method of identifying those that are unsafe.
- A list of services the community may need, which will and will not be provided by the agency, and where those services will come from if not provided by the agency.

The ERP must identify the necessary resources and manpower to provide its intended response services to its respective area of responsibility.

In the ERP, the tiers and types of responders and their expected roles must be identified. (for example, interior structural firefighter, exterior only operations firefighters, fire police, vehicle operators, technical specialists, EMTs, EMRs, Paramedics)

Team members must be permitted to participate in the development of the ERP.

Medical Requirements:

- Establish a medical program that is compliant with NFPA 1582 (this is for every agency to comply, not just firefighters).

- Comprehensive physical exams appropriate for all roles and tiers at least every 2 years for every member who may be exposed to combustion products 15 or more times a year.

- Appoint a properly trained and qualified medical officer or manager to oversee your program and maintain confidential records.

- Provide for the costs of exams, tests, and time lost.

- Establish guidelines that set timelines and conditions for requirements of return-to-duty evaluation after an illness or injury.

- Perform medical monitoring of exposures to all hazardous substances and chemicals, biological hazards, and combustion products.

- Establish a behavioral health program that includes ongoing monitoring, counseling, post-incident care, and referral and crisis care.

- Establish policy defining fitness for duty and how member readiness is monitored.

Establish an ongoing health and fitness program:

- Appoint a Health and Fitness Officer or Manager who is trained and qualified to oversee member health and fitness.

- Provide an opportunity for members to exercise while on duty.

- Execute a health and fitness assessment of each member at least every 3 years.

- Provide education and counseling regarding health promotion for all responders.

Training:

Provide initial training, on-going training, refresher training, and professional development to all members based on their expected job tasks for their levels and tiers.

Ensure all instructor/trainers are qualified and meet knowledge, skill, and ability expectations.

Provide training in a language and at a literacy level that will allow responders to understand and that it allows time for questions and interactive learning.

Provide training on all policies and procedure to include the risk management plans, health and wellness program, Incident Management System, all aspects of PPE, fire extinguisher use.

Every emergency responder must be trained how to act in dangerous situations and events such as orderly and rapid evacuations or equipment failure.

Each team member is at least HAZWOPER First Responder Awareness level trained.

Each team member and responder is CPR and AED trained.

Facility and industrial responders trained to comply with NFPA 1081-2018.

Interior structural firefighters meet or exceed NFPA 1001-2019 and NFPA 1407-2020 (Rapid intervention team standard).

Each vehicle operator must be at least trained in accordance with requirements of NFPA 1002-2017.

At a minimum, every manager/supervisor/crew leader/officer must be trained to the appropriate level set forth in NFPA 1021-2020.

Specialized training minimums:

Wildland firefighting – NFPA 1140-2022.

Technical rescue – NFPA 1006-2021.

Marine environment – NFPA 1005-2019.

EMS providers shall be trained and certified to state or jurisdictional minimum requirements based of level of responder.

Team members and responders are required to demonstrate proficiency of knowledge and skills annually of the JPRs for their respective tier and level.

Facilities Preparedness:

Provide facilities for decontamination, disinfection, cleaning, and storage of PPE.

Fire poles and their vertical openings must comply with safety protections.

Sprinklers are mandatory in new construction.

Vehicle exhaust exposure prevention measures are required.

No contaminated PPE in sleeping and living areas.

Must ensure standpipe and hose fitting compatibility with responding fire departments.

Equipment and PPE

Provide equipment and PPE to team members to train and perform work at no cost.

Maintain all equipment and perform periodic testing. Also establish a procedure for reporting defective gear and equipment and removing it from service.

New PPE must comply with the NFPA standard associated with its purpose (example: structural firefighting gear meets NFPA 1971).

Personal items permitted for use must also comply with all above.

PPE and equipment must have gross decontamination before leaving scenes.

No contaminated gear or PPE in passenger compartments of vehicles.

Vehicle Preparedness

Process in place to assure vehicle is inspected, maintained, and repaired.

Process in place so every member knows when and how a vehicle is to be taken out of service.

Every riding position is a seat and has appropriate restraints.

Fire apparatus is inspected and maintained in accordance with applicable NFPA standards.

Vehicle Operation

No vehicles will move until all occupants are seated and properly restrained and shall remain so any time the vehicle is in motion.

Team members providing care to a patient must be restrained any time doing so will not directly impact the ability to deliver care.

Harnesses provided and used when engaged in pump-and-roll operations, loading hose or other activities that require work while the vehicle is in motion.

Policies required for team member use of vehicle not under direct control of the agency such as POVs for response to facilities or scenes.

Pre-Incident plans must be completed on facilities determine to require them in the ERP. These plans should address site contacts, resources available and needs for additional resources, hazards, and unique challenges. These plans must be made available to all team members and reviewed annually.

Agencies shall utilize an Incident Management System (IMS) and encouraged to be standardized with the current NIMS framework.

Emergency Incident Operations

Every incident utilizes an IMS and has an assigned Incident Commander or Unified Command.

Every incident has safety addressed either through the role of the IC or UC (smaller incidents) or through designation of an Incident Safety Officer. Crews must be rotated periodically in extended or complex incidents.

Every emergency incident has established control zones by IC that are clearly identified and marked in a conspicuous manner whenever possible. The locations of the control zones must be shared with every team member or responder before they are assigned to any control zone.

Minimum of 4 adequately trained members respond before entry into an IDLH. Two-in, two-out followed unless imminent danger to life exists. (Immediate rescue)

Positive pressure SCBA or supplied air respirators with a 5-minute rescue bottle only in IDLHs.

A personnel accountability system must be utilized.

Rapid Intervention Crew (RIC) must be established as soon as feasible at structural fires when crews are operating in IDLH.

An adequate communication plan and system must be established and used during incident operations.

Establish Rehab with medical monitoring as well as traffic control procedures when needed.

When using skilled support workers (SSW) (tow operators, equipment operators, industry reps) agency must ensure they are properly protected, using appropriate PPE, and are properly escorted when operating at an incident.

Every response agency must establish SOPs addressing all areas of operation and readiness. Specific areas include: PPE wear, use, cleaning, inspection and repair; Post-incident decontamination and contamination prevention of team members

including gross decontamination, showering and hygiene; radio communications procedures; Mayday procedures; operations at vacant dwellings; medical monitoring and rehab; crime scenes; traffic incident operations.

Post-incident analysis must be performed on any significant event such as a large-scale event, a near-miss event, any team member, responder or SSW injury or illness requiring treatment or fatality.

The agency performance to meet the ERP must be reviewed annually and any discrepancies must be addressed.

What Standards are Included By Reference?

The following standards have been included by reference and any section therein with a 'shall' or 'must' statement are to be complied with:

NFPA 1001, Standard for Structural Fire Fighter Professional Qualifications, 2019 ed.

NFPA 1002, Standard for Fire Apparatus Driver/Operator Professional Qualifications, 2017 ed.

NFPA 1005, Standard for Professional Qualifications for Marine Fire Fighting for Land-Based Fire Fighters, 2019 ed.

NFPA 1006, Standard for Technical Rescue Personnel Professional Qualifications, 2021 ed.

NFPA 1021, Standard for Fire Officer Professional Qualifications, 2020 ed.

NFPA 1081, Standard for Facility Fire Brigade Member Professional Qualifications, 2018 ed.

NFPA 1140, Standard for Wildland Fire Protection, 2022 ed.

NFPA 1407, Standard for Training Fire Service Rapid Intervention Crews, 2020 ed.

NFPA 1582, Standard on Comprehensive Occupational Medical Program for Fire Departments, 2022 ed.

NFPA 1910, Standard for the Inspection, Maintenance, Refurbishment, Testing, and Retirement of In-Service Emergency Vehicles and Marine Firefighting Vessels, 2024 ed.

NFPA 1951, Standard on Protective Ensembles for Technical Rescue Incidents, 2020 ed.

NFPA 1952, Standard on Surface Water Operations Protective Clothing and Equipment, 2021 ed.

NFPA 1953, Standard on Protective Ensembles for Contaminated Water Diving, 2021 ed.

NFPA 1971, Standard on Protective Ensembles for Structural Fire Fighting and Proximity Fire Fighting, 2018 ed.

NFPA 1977, Standard on Protective Clothing and Equipment for Wildland Fire Fighting and Urban Interface Fire Fighting, 2022 ed.

NFPA 1981, Standard on Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services, 2019 ed.

NFPA 1982, Standard on Personal Alert Safety Systems (PASS), 2018 ed.

NFPA 1984, Standards on Respirators for Wildland Fire-Fighting Operations and Wildland Urban Interface Operations, 2022 ed.

NFPA 1986, Standard on Respiratory Protection Equipment for Tactical and Technical Operations, 2023 ed.

NFPA 1987, Standard on Combination Unit Respirator Systems for Tactical and Technical Operations, 2023 ed.

NFPA 1990, Standard for Protective Ensembles for Hazardous Materials and CBRN Operations, 2022 ed.

NFPA 1999, Standard on Protective Clothing and Ensembles for Emergency Medical Operations, 2018 ed.

ANSI/ISEA 207, American National Standard for High-Visibility Public Safety Vests, 2011 ed.

Questions and Comments?

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Dave Denniston, NVFC OSHA Task Force Chair, ddenniston@mcneilandcompany.com, (607) 423-1636

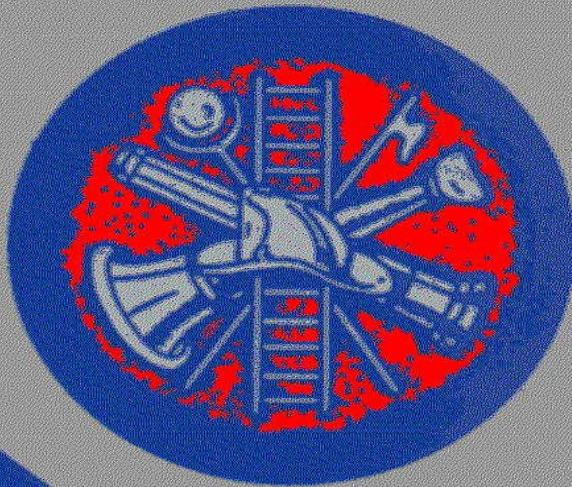


NVFC

NATIONAL VOLUNTEER FIRE COUNCIL
FIRE • EMS • RESCUE

NEVADA STATE

FIREFIGHTER'S



ASSN.



What Does OSHA's Proposed Emergency Response Standard Mean to Your Fire Department? OSHA is proposing a new Emergency Response Standard to replace the existing Fire Brigades Standard. This proposed standard imposes numerous requirements that would be infeasible for many volunteer fire departments to comply with. Below is a summary of some of these requirements and what questions you may ask yourself as you develop your public comments. The public comment period on this standard runs through July 22, you may submit comments here: <https://www.regulations.gov/commenton/OSHA-2007-0073-0118> and view additional resources to assist with public comments on the NVFC's OSHA landing page here: <https://www.nvfc.org/day-of-action-on-proposed-osh-standard/>.

- Approximately \$14,000: OSHA estimates that the annual cost for a small volunteer fire department to comply with this standard would be approximately \$14,000. The NVFC believes the cost of compliance would be much greater. What's your department's budget? Could you absorb this expense? Is there any local funding source to assist you? Is this estimated cost of compliance accurate or is it underestimated? Why or why not?
- Truck Check Training: Only personnel with Department of Transportation training and chassis inspection training will be able to do annual and quarterly truck checks. Do members of your department have this expertise and is this training readily available to you?
- Medical Exams: Firefighters will have to pass an NFPA 1982 medical exam every two years, or annually if they've been exposed to products of combustion 15 or more times. FEMA grant allowance for these physicals is \$1200 to \$1400 per physical and actual costs can be much greater. Does your department have the resources to facilitate this for each firefighter? And regarding the threshold of 15, OSHA doesn't adequately define what an "exposure to products of combustion" is and has no basis as to how they arrived at the arbitrary number of 15.
- Officer Training: All officers will be required to have training that meets or exceeds NFPA 1021 Fire Officer Training. This training is a one size fits all approach, outside the scope of many small departments, costly and not readily available. According to the National Associations Fire Training Directors, Fire Officer 3 training is only available in 26 states. Is this training readily available to you?
- Brake Testing: You will be required to set up and conduct an annual brake test for all of your trucks. Do you have access to such a testing facility? Can you take your apparatus offline for such annual testing?

Mandate of Voluntary Consensus Standards: OSHA's proposed Emergency Response Rule would incorporate by reference over all or portions of 20 plus industry consensus, effectively making them law. These standards are available to view for free online, but printed copies of these standards are not free. This limited access to consensus standards is particularly problematic since many volunteer fire departments in rural areas lack reliable internet access. OSHA should not be mandating departments to comply with standards they cannot readily access. What obstacles does your department face in retrieving these standards? Cost? Reliable internet access?

- Administrative Tasks: This proposed standard would require your department to:
 - o Create, annually review, and annually update a written community emergency response plan.
 - o Create, annually review, and annually update a written pre-incident plans for all high or special risk properties.
 - o create, annually review, and annually update a written risk management plan for the department.
 - o Conduct a community vulnerability and risk assessment for your service area

o OSHA estimates that one-time setup of these various administrative requirements would take about 92 hours and an additional 43 hours to review annually. The NVFC believes much more time would be needed to comply with these requirements.

- o Does your department have local funding for the hazard assessments of all buildings in your area? Additionally does your department have the administrative capability and expertise to fulfill these requirements? Are OSHA's estimated hours needed for compliance correct?

Lets meet a few folks



Mike graduated from Pershing County High School in 1975. Mike moved to Reno and married his wife Wendy in June of 1979. They are the proud parents of two children Joshua and Paige. He returned to Lovelock in 1982 to work for Pershing County School District, where he retired from in March 2007 as the facilities engineer and maintenance supervisor. Mike then went to work for the Hawthorne Army Depot Fire Department in 2008 where he held the position of Training Officer/EMS Coordinator and later Assistant Fire Chief until he retired again in February 2017. He was approached by a few colleagues to consider a position in Emergency Management for Churchill County. Mike accepted the Churchill County Emergency Manager position February 2017 in time to assist in the “High Water 17” spring thaw event and implement some strategies to avoid flooding in the City of Fallon until 2023. In addition, he is also employed as an adjunct instructor for the Nevada State Fire Marshal Training Division and is contracted as part of the Command Staff and Fire Chief for the annual Burning Man event held each year in the Black Rock Desert.

He attended many meetings of the Nevada State Firefighters Association and was appointed Secretary in 1999, a position that transitioned into the Executive Director, which he still holds today.

Qualifications:

- ICS 100,200,300,400,700 and 800 levels
- NFPA Firefighter I and Firefighter II
- National Fire Academy Fire Safety Officer Trainer
- National Fire Academy Q-318 Fire Service Supervision Certification
- Emergency Management Institute (FEMA) Exercise Evaluation and Improvement Planning Certification
- Emergency Management Institute (FEMA) Emergency Manager Certification
- Emergency Management Institute (FEMA) Developing and Managing Volunteers
- Emergency Management Institute (FEMA) Public Information Officer
- Emergency Management Institute (FEMA) Threat and Hazard Identification and Risk Assessment

- Lead Evaluator for Nevada State Fire Marshal Division
- Adjunct Instructor Nevada State Fire Marshal Office
- Nevada Threat Analysis Center Intermediate Terrorism Liaison Officer – Department of Homeland Security
- NFPA Hazardous Materials Awareness, Operations, Technician and Hazmat Incident Command levels
- Fire Instructor I and Fire Instructor II - Fire Service Master Instructor III
- NFPA/DoD/IFSAC Fire Inspector I&II
- NFPA Fire Officer I and Fire Officer II
- NFPA Driver Operator
- Emergency Medical Technician Intermediate/Advanced

Jamie Winrod

President

My name is Jamie Winrod. I am currently in my second year as president of the Nevada State Firefighters Association. I have been a member of the NSFA since 2009. In my professional career, I serve as the City of Elko Fire Marshal. Following my father and sister's footsteps, I joined the City of Elko Fire Department volunteer branch - Lee Engine Company. I was a volunteer firefighter from 2008-2017. In 2017, I transitioned into a full-time position with the City of Elko Fire Department, and in 2020, I began my official role as Fire Marshal. In my spare time, you will find me with my husband, Jeff, and three boys Pierce, Preston, and Perry. We enjoy traveling to nearby cities, taking family vacations, and camping.

Ralph Hamman

NSFA Vice President

Ralph is a Life member of the NSFA and has 30-plus years in the Fire service. His experiences include over twenty years with Naval Air Station Fallon Federal Fire Department where he retired as Fire Chief, 28 years with the Fallon/Churchill Fire Department (retired as Fire Chief in 2018), and two years with the Lovelock Volunteer Fire Department. Since his retirement, he has enjoyed hunting, fishing, golfing, pickleball and wintering in Arizona with his wife and friends.

Kenneth Smith

Director

Kenneth Smith was raised and lived in Southern California until he moved to Las Vegas in 1992 for a job in mining. While employed at the mine, he became involved with their in-house Fire and Rescue team and began to really enjoy the team. In 1995 he moved to rural Clark County and in April of 1996 joined Clark County Fire Dept. as a volunteer in Sandy Valley. Over the years and through a few career paths, the Fire Service has been a tremendous adventure for him and his family and he believes there is truly no better way he could have served his community.

Larry Haydu

Director

Larry began his fire service career 44 years ago, and in 2022 he retired from the Clark County Fire Department as the Assistant Fire Chief of Rural Services where he managed the department's 10 rural volunteer fire stations and approximately 120 volunteers. During his time at the Clark County Fire Department, Larry was involved in several major incidents including serving as the Deputy Incident Commander during the October 1 shooting, the Moapa floods, and several large wildfires. His retirement only lasted three days until he accepted a position with the Nevada National Security Site (previously the Nevada Test Site) as the Deputy Chief of Training. Larry has been a member of the board since 2022 and has been the recipient of the Nevada State Firefighters Association "Fire Instructor of the Year Award" twice. Larry and his wife Kathy reside in the Northwest area of Las Vegas.

Andrew Ostendorf

Director

Andrew Ostendorf moved from rural Illinois to Elko, NV in 2010 to work as a mine geologist. He has been a firefighter for the City of Elko for almost 10 years and a member of various surface and underground mine rescue teams for mining companies for nearly 13 years. Andrew currently works as an environmental specialist for mine closure and reclamation projects. He is the third in a family tradition of firefighting following in the footsteps of his father and grandfather. When not helping out in his community you can find him in the mountains skiing, backpacking, or fly fishing.

Jacob Stark

Director

Jacob Stark is the Assistant Chief/EMS coordinator for the City of Ely Fire Department. Their department is a combination all-risk department with a total of 37 Firefighter/AEMTs on the roster. Jacob has been a proud member both professionally and as a volunteer since 2017. He has obtained many qualifications in the fire service and training is his primary focus at his department in order to provide the highest level of emergency services in the area. Jacob is a firm believer that the best leaders create leaders, and his hope is to get all members of the department well-trained so that when his time comes leave or retire that department is better than when he came into it.

From the E.D

Do you know or are you responsible for your departments ISO rating?

Your community deserves the best but are they willing to support the program and do they understand it.

What is ISO and how can it effect your department? ISO ratings vary across Nevada and are a big factor in determining insurance rates for both private and public sectors alike. Although ISO is not the only rating system, it is the most widely accepted. Other rating systems do exist, but all use the same basic scoring schedule with Insurance Services Organization being the most common. An ISO audit peeks under all the rocks to expose the Departments' strengths and weaknesses. A poor ISO review has significant consequences. Fire chiefs should know what an ISO audit is and prepare for it. A positive ISO rating has significant financial benefits for the fire department and the community it serves. Fire still causes the most loss to homes and businesses.

ISO uses a fire suppression rating schedule that assigns numeric value to a community's fire prevention and protection capabilities. Those values then determine the 1 to 10 score we are familiar with, which

ISO calls the Public Protection Classification. As a reminder, a score of 1 is the highest rating, one which less than 1 percent of communities achieve. The Fallon/Churchill VFD maintains an ISI #1 rating and to my knowledge is the only ISO Class 1 fully volunteer fire department with that rating in the United States today. Ten means the community does not meet the minimum fire protection and prevention standards.

To determine the PPC score, ISO looks at several factors. Many of those are beyond a fire department's control. Here is what ISO says it looks at and how much weight it gives each area. Most of those areas are all well within a fire department's control. A maximum of 50 points of the overall score is based on the fire department. ISO reviews the distribution of fire departments throughout the area and checks that the fire department tests its pumps regularly and inventories each engine and ladder company's equipment according to NFPA 1901. A maximum of 40 points of the overall score is based on the community's water supply. This focuses on whether the community has sufficient water for fire suppression beyond daily maximum consumption. ISO surveys all components of the water supply system. It reviews fire hydrant inspections and frequency of flow testing, as well as counting the number of fire hydrants that are no more than 1,000 feet from the locations. A maximum of 10 points of a community's overall score is based on how well the fire department receives and dispatches fire alarms in accordance with NFPA 1221. Field representatives evaluate:

- Type and extent of training provided to fire

company personnel

- Number of people who participate in training
- Firefighter response to emergencies
- Maintenance and testing of the fire

- The emergency reporting system
- The communications center, including the number of telecommunicators
- Computer-aided dispatch facilities
- The dispatch circuits and how the center notifies firefighters about the location of the emergency

How to Improve Your ISO Ranking and Why It Matters

A maximum of 50 points of the overall score is based on the fire department. ISO reviews the distribution of fire departments throughout the area and checks that the fire department tests its pumps regularly and inventories each engine and ladder company's equipment according to NFPA 1901. ISO also reviews the fire company records to determine factors such as:

A maximum of 40 points of the overall score is based on the community's water supply. This focuses on whether the community

- Firefighter response to emergencies
- The emergency reporting system
- The communications center, including the number of telecommunicators
- Computer-aided dispatch facilities
- The dispatch circuits and how the center notifies firefighters about the location of the emergency

Finally, the community risk reduction section offers a maximum of 5.5 points. ISO says these extra points rewards communities that implement effective fire prevention practices, without penalizing those who have not yet adopted such measures. The areas of community risk reduction evaluated include fire prevention, fire safety education and fire investigation. These are extra-credit points not included in the total; department scores are measured against 100 points.

So, of the 105.5 possible points, fire chiefs only have control over 55.5. Some may have control over the 911 center and may be able to influence some of those 10 points. And if a fire department is responsible for hydrant testing, it can control some of those points as well. Conversely, there will be some areas of the fire protection category, like stations, apparatus, and staffing, that will be outside the scope of many fire chiefs to directly influence. That control most likely rests with elected officials or fire district boards. That means that in order to get the best score possible, fire chiefs need to be focused on those areas where they have direct control. Maximum scores in those areas will make up ground for points lost in areas outside department control. All this scoring and ranking leads to one end — how much businesses and homeowners in a fire department jurisdiction will pay for property insurance. Well, sort of. While knowing how likely a structure is to be saved by a fire department weighs on

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Whether an insurance company uses ISO or some other matrix, they all need to calculate

the likelihood that a structure will be a complete loss in the event of fire. And following the guidelines laid out by ISO will improve a fire department's capability and lead to better fireground outcomes and a safer community.

What can't be overlooked is the political value of a good or improved ISO rating. This gives the fire chief something to brag about to elected officials who hold the department purse strings. And it gives those officials something to publicly brag about to the residents who decide if they keep their jobs at election time. That's because lower insurance rates are one way to attract businesses, and to a lesser extent, homebuyers, into a community. And attracting business can boost property values and tax revenue coming into the municipality. Remember, ISO is a private entity and has no power to issue fines or limit operations — like OSHA does. But its scores are widely used and publicized. So, when the score worsens, it puts a great big bullseye target on the fire department. Anybody looking to take shots at the department's budget or its chief, now has plenty of ammunition.

The fire department and fire prevention categories are most important. ISO's fire department category has nine subcategories that each have point values adding up to 50. For example, there are four subcategories covering apparatus availability, equipment, and capability. Those four are collectively worth 14 points. How close fire stations are to the farthest reaches of the jurisdiction accounts for 10 points. And the number of personnel available makes up 15 of the points. Two points can be earned for having standard operating procedures for structure fires and having an incident management system. The remaining nine points are awarded based on firefighter training. That, of course, is what fire chiefs have full and direct control over. Getting all nine of those points is a must for boosting an ISO score. It is also an area where fire departments tend to make the most mistakes — and where records management is extremely important. The training category is broken into company training, hazmat training, officer training, driver training and facility training. And that last one, facilities training, is where the most problems occur. It alone is worth three of the nine training points — getting this right is very important. For ISO purposes, all firefighter training, facilities, and other categories, must directly relate to structural fire. Things like EMS training don't impact a fire department's ability to protect property, so they don't factor into ISO's rankings. And the physical facilities must meet a set of criteria for maximum points in the facilities training category. Those include being three stories, having burn and smoke rooms and sitting on at least 2 acres.

Once a training category's minimum requirements are met for a firefighter, additional training in that category can be applied to other categories. For example, if a firefighter has her 18 hours of required facilities training and goes back to that facility for hazmat training, those additional hours can count toward her six required hazmat hours. Fire departments often get into trouble by trying to double dip. So, a firefighter's two hours of hazmat training at a qualifying facility can count for either facility or hazmat, but not for both. Record keeping system can help departments avoid potential problems like putting training hours in the wrong place. It is important to track each firefighter's training hours by category and move additional training hours into the appropriate place. It will also allow department leaders to quickly see where the department stands. It will also let the officers know the status of overall ISO-required training; on which firefighters are missing certain

required, and that training involves a planned course with an instructor and required skills documentation.

So, in comparison, what does this mean for the community that you serve:

Based on a \$100,000 dollar home, rated at a Class 8, the annual premium through All State is \$354; the same home at a Class 3 would be reduced to \$293, for an annual savings of \$61. Amortized over 15 years, the savings will be \$915 to each homeowner.

The next survey was taken from Independent Insurance: at a Class 8, the annual premium would be \$520. That same home at a Class 3 will be reduced to \$401, for an annual savings of \$119. Amortized over 15 years, the savings will be \$1,785 to each homeowner.

The next survey was taken from Metropolitan Insurance: at a Class 8, the annual premium would be \$766. That same home at a Class 3 will be reduced to \$370, for an annual savings of \$396. Amortized over 15 years, the savings will be \$5,940 to each homeowner.

For example, if you base this on an approximate number of 1,500 homes that this rating directly affects, the lowest savings amount will be approximately \$61 per year for each home. This number, times the total homes affected, is \$91,500 per year. Over 15 years, this equals a savings of \$1,372,500 throughout your jurisdiction. Of course, you can add or subtract the number of homes you protect to calculate your savings

Using this same model from the highest quote and savings of \$396 per year per home, the total annual savings for the jurisdiction is \$594,000 per year. Over the duration of the 15-year rating, this rating could save up to \$8,910,000 to your customers!

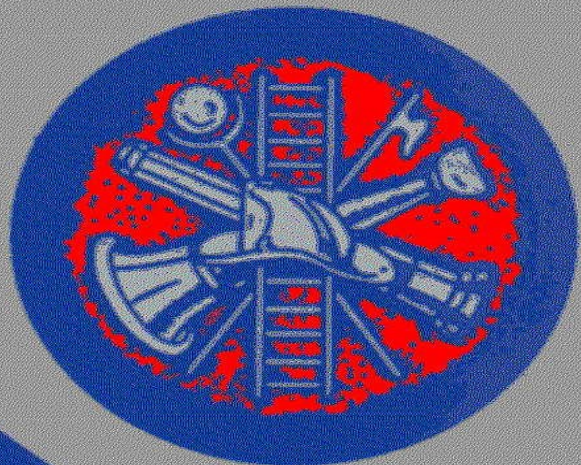
The important section of this comparison is that it is based upon a \$100,000 home. So the savings will be higher if your home is valued at more than the \$100,000 used in this scenario. And don't forget about the savings to your local businesses and public facilities who also pay insurance premiums.

As you can see, your ISO rating is an extremely important tool to evaluate your fire department and justify budget requests to you elected officials.



NEVADA STATE

FIREFIGHTER'S



ASSN.

.Carlin Fire Cadet Program: Shaping future leaders in the fire service through training and community service.

The Carlin Fire Cadet program is making waves in the fire community with its commitment to training the next generation of fire and EMS personnel while actively participating with the fire department and assisting in community events. This innovative initiative prepares cadets for careers in firefighting and emergency medical services and instills values of service and honor.

Carlin Fire Dept started the first Explorer group in 2006 but with lack of participation, the program went dormant until 2019. At that time, a young individual named Allie Landrith asked to train with Carlin Fire. Her excitement, enthusiasm, dedication, and commitment drew other members' teens to become active in the department. Since then the program has continued to grow and expand.

The goal of the program is multi-faceted, focusing on community service, leadership, fire and EMS skills, fire prevention, career development, Honor Guard, and life skills in general. With the decline in volunteerism, the program strives to develop the spirit of volunteering and giving back to the community you live in. If this mindset can be developed, we hope to recruit new members as they grow old enough to be full members of our department.

Ranking is a tiered system created by the Cadets that is as follows; Cadets come into the program as "rookies" and move to "Cadet" status. The next level is "Leadership" followed by "Officers". All ranks are based on experience, hands-on skills, written knowledge tests, and interviews completed by a panel of Fire Department members. Each tier has new responsibilities and privileges. Training and community service are driven by the cadet's interest and mentors for the program look for career development opportunities.

Cadets train with the department members and have their own training schedule as well. They hold one fire training and one EMS training each month along with a business meeting to discuss and determine their plans. Cadets have been allowed to attend Exterior Support classes with members, CPR classes and are welcome to all fire and EMS training that the department does each month.

The cadets play a crucial role in honoring fallen members, heroes, standing tall as part of the Honor Guard during memorial services. This past year they have been very active in Honor Guard training, learning flag etiquette and rules, and have practiced hard to be professional when asked to participate in these events. Their unwavering commitment to paying tribute to those who have been lost or paid the ultimate sacrifice is truly commendable.

Carlin's Cadet Program received an honorable mention award for Junior Firefighter Program from NVFC, and its Cadet Captain, Allie Landrith, received an honorable mention for Junior Firefighter of the Year. The program has developed a reputation for helping in community events assisting the American Legion, Carlin Senior Center, Friends of the Library, Carlin Parks and Recreation board, National Night Out, just to name a few.

Cadets have attended such events as the EMS Conference in Provo, UT, EMS Conference in Elko, and Nevada State Firefighters Conference in Elko. Cadets must be grade eligible and in good standing to be able to attend these events.

The Carlin Fire Cadet program is more than just a training ground; it's a place where young individuals are molded into future leaders. By fostering a strong sense of community and service, these cadets are not only preparing for their careers but also making a lasting impact on Carlin. Carlin VFD is proud of our program and the youth we are seeing grow to responsible adults.

WANTED

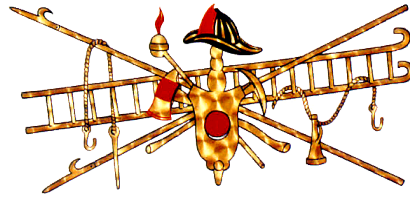
VOLUNTEER FIREFIGHTERS

REQUIREMENTS:

must be willing to risk life
save tax payer's \$137 billion per year
train for hundreds of hours
be very courageous
ignore what your brain tells you
respond 24/7
leave family at dinner table
get yelled at by angry motorists
wear a snow suit in summer
witness death and dismemberment
never know what your getting into
have balls of steel
have a day job
deal with people in pain
not be afraid of heights
keep a good attitude and...
be ok with not getting a thank you

Not exactly sure who gets the credit for authoring this but I am sure who ever originally wrote this will not mind it being included in your Pumper.

The Firefighter's Prayer



**When I'm called to duty god
wherever flames may rage
give me strength to save a life
whatever be its age
Help me to embrace a little child
before it is too late
or save an older person from
the horror of that fate
Enable me to be alert
to hear the weakest shout
and quickly and efficiently
to put the fire out
I want to fill my calling and
to give the best in me
to guard my neighbor and
protect his property
And if according to your will
I have to lose my life
bless with your protecting hand
my children and my wife**

How fast is too fast?

We all agree that during emergencies, time is one of the most valuable commodities that we never have enough of. So how can we manage the little time we have even during a response?

The tones go out, *'Structure fire, near the intersection of ABC & 123, reported to be single family residence, unknown if occupied, PR is passer-by with no call back number'*. Moments later as you are donning, *'We are now receiving multiple reports of a large column of smoke in the area of the initial call that can be seen from a distance'*. Leaving the bay, you see the tell-tale column of smoke confirming that something is burning. Is it a residence, a business, a vehicle, or a trash pile? Is the structure occupied or abandoned? Is this going to be an entry situation or is the building in imminent collapse and you will be adopting a defensive only approach? What do we really know until we arrive and get eyes on this scene?

As the operator of the apparatus, you have the added burden of fighting back the adrenaline created by this scenario and maintaining the safe operation of the vehicle; not just for you and your crew, but for the public around you on the roadways.

All agencies have a Standard Operational Procedure for job tasks ranging from dress code to after action reporting and vehicle operations are no exception. A typical agency SOP for vehicle operation will list the posted speed limit as the maximum allowable speed unless running code (lights and siren) to an emergency scene. Exemption to this speed limitation while driving code typically allow for:

Never more than 10 MPH over the posted limit –

Never faster than 75 MHP –

No faster than road conditions allow –

However, I would like to take it a step further from my training as a commercial driver and experience having driven long haul and local delivery:

Never exceed 5 MPH under the governed speed of the vehicle –

Nearly all of the apparatus in use today are equipped with a speed governor to prevent excessive top speed and this speed can be in the 65-75 MPH range. While driver's training usually centers on emergency braking and slowing, there does come times where acceleration can become the savior. As an example of this school of thought that each of us has probably experienced at one time, even if only in our personal vehicles, is:

You are traveling highway speed, an object that could cause damage to your vehicle appears in your lane (unsecured cargo from a truck or an item that came into view as vehicles in front of you swerved around), the lane to your right/left has a window of opportunity if you accelerate and braking will result in you colliding with said object or being run into by other vehicles if changing lanes

So let's examine our response scenario from before; the intersection of ABC & 123 is just outside of town with 5 miles of highway travel required. The highway has a posted speed limit of 75 MPH, our agency speed limit is 75 MPH, and our apparatus is governed at 75 MPH. After using a little of that algebra we all swore to the math instructor that we will never need after graduation, we find that our highway travel will last 4 minutes if driving at the governed speed of 75 MPH. A few equations later we can see that by reducing our speed to 70 MPH, 5 MPH below our governor, it will take 4 minutes and 17 seconds.

Tracking numbers show that in the state of Nevada, 32.1% of traffic fatalities are speed related with 55% of those incidents listed as 'single vehicle'; correct, no one else to blame. Nationwide data shows that 12% of On-duty Firefighter fatalities occur while responding to or from calls for service and vehicle collisions are the second highest leading cause of Firefighter fatalities.

So, what can I buy for 17 seconds of time? My answer – not becoming a statistic; the knowledge that I am looking out not just for my own safety but that of my crew and my community; that while responding to address someone's emergency, I did my part to not become the emergency; and, I did not risk the loss of apparatus that is so vital to the community I chose to serve.

So, what can you buy for 17 seconds of time?

Is It Time to Rethink Your Organizational Structure

Michael Heidemann – NSFA Executive Director

Is your department struggling to keep up? Not enough people to respond, not enough people to serve on committees, not enough people to take on added responsibilities, and not enough people to do all the jobs that need to get done. The biggest challenge faced by today's volunteer firefighter or EMS provider is time. Not enough time with the spouse and kids, not enough time to devote to our careers, favorite past times and not enough time to do what we love to do: volunteer.

Times have changed and the things we did for our communities thirty years ago are becoming more difficult to deliver, few individual volunteers have the time to be everything they once were to the fire department. We have always been there for anything our community needed. If you needed your flooded basement pumped out, who do you call? If a storm knocks down a tree and it blocks the roadway, it's the fire department that gets called to remove the hazard. Who do even the police call when they can't handle a situation? When the power goes out and the traffic signals are dark at every intersection in your town, the police call on the fire department to fill in and take over until power and order are restored. Brush fires, medical calls and good intention standbys are also increasing. In addition, we are also involved in community events such as blood drives, school events, parades and so on. The firehouse was always a central place for the community to reach out to for support. But those days are fading fast.

The advent of DINKs (Double Income-No Kids) and MWCs (Married with Children), the infiltration of countless activity opportunities, and the influence of and dependency on technology have created a time warp that is working against the volunteer fire service. People have more choices but seemingly less control over their "disposable" free time. (I Borrowed this from another source)

So, how can we get the same job done with the same set of people who have less time to volunteer? The blunt reality is: we can't any longer. Doing more with less isn't working.

How can we fix this problem, what are our options? One option is to cut down on the services we provide but is that in the best interest of the community or why we joined in the first place. And how do you decide what program to drop. Which are essential, and which can better be served by another organization? If your manpower situation warrants it, face the hard facts and cut back to delivering only those services for which your municipality contracts and pays for. For example, if your volunteers are struggling to keep up with the training and response requirements associated with your basic service offering, yet the added burden of specialized rescue training is keeping them from building on their core competencies, you must ask yourself, "Is it time to cut back on the number of services we provide? When we volunteer take on a job – being the over-achievers we are – we typically jump in with both feet. Unfortunately, we've jumped with both feet into so many jobs that we often spread ourselves too thin. We end up being fair or poor at a lot of things instead of being good at a few. This contributes to accidents and burn out. Not to mention potential litigation. However you choose to address a particular task, do it completely. Do it right or don't do it at all.

It's obvious that employing the option just discussed can be a double-edged sword. Reducing services can lead to reduced public support, financially and politically. Be careful and thoroughly think it through. Go to your local governing body, city, county commission or council and lay out

your predicament. Ask them for input. There may be a chance they can provide an incentive tool for recruitment. Show them what it will cost in tax dollars to provide a total career fire department. To provide a paid department, they will have to pay at least as much as surrounding areas pay, plus all the benefits. Try to get a feel for where they are headed in the future.

Another option is to recruit more people. This would help to reduce the workload of each volunteer but utilize a larger total number of volunteers to share the load. But where are these new volunteers coming from? How many of you have a waiting list of people hoping for an opening on your department?

What do you need more volunteers for? What specific jobs do you need them to perform and how many volunteers do you need to perform each job function? What type of volunteer is best suited to get the job done? Do you need more suppression firefighters, EMS personnel or maybe just someone to coordinate fundraising events, social events or department record keeping. You need to do a community risk analysis and needs assessment to determine where the gap is. An honest needs assessment can determine what type and how many more volunteers. It sets the stage for how you structure or re-structure your membership, as well as how you plan to attract the new volunteers you need. If your department requires new volunteers to be certified in everything, for example Firefighter 1 & 2, EMT, Rescue Technician, etc., etc. – I say good luck. While cross training is essential to a certain extent, going overboard can easily overwhelm most volunteers, burning them out prematurely. Interior firefighting may not be for everyone, but there is a place in your department for someone who wants to volunteer their time. It is time to think outside the box and change some of the cultures in our organizations. This will take strong leadership and people skills as change is not accepted freely across the department. We need to recognize and admit that a job that once took 10 volunteers 10 hours a week to accomplish may now require 20 volunteers who only have 5 hours a week to offer.

Another burden on departments today is requirements by our municipalities to provide a certain level of service. Whether NFPA standards or OSHA requirements, and yes Nevada Firefighters both career and volunteer are subject to OSHA requirements as they are employees of the authority having jurisdiction. We must convince our elected officials that public safety is a priority and fund it as such. Property tax breaks, defined contribution programs, reimbursement for lost wages while attending certification training etc., etc. are some possibilities to help recruit and/or retain our membership.

Remember how the fire service got started with Benjamin Franklin and his plea to “come when you can” was the standard. I believe helping when you can is still the core value of the volunteer service, however we must ensure that everyone is trained

Stress First Aid to Combat Burnout and Compassion Fatigue

Heather Haslem

The past few years have had a tremendous amount of stress and challenges. To name a few stressors we've endured – the pandemic, political uncertainty, climate change, the opioid epidemic, mass shootings, financial instability, and the list goes on... Today, we see what is happening in Ukraine. The massive amount of stress, uncertainty, and trauma in our world has had an impact on everyone – including providers.

Stress continues to be a major concern for both physical and mental health. According to APA's Annual Stress in America Study (2021), 80% of Americans reported prolonged stress. Studies have demonstrated that long-term stress has an effect on the immune system (i.e., raises the risk for viral infections) and impact a person's risk of developing chronic disease – such as heart disease and diabetes (Salleh, 2008). In addition, 84% of people reported feeling emotions associated with stress in the last 2 weeks. The most common emotions included: anxiety – 47%, sadness – 44%, and anger – 39% (American Psychological Association, 2021).

As care providers none of this is new information – as you live the reality every day. Many are weary and worn down. With the constant state of change and daily chaos, this massive amount of stress and uncertainty, poses a threat to physical and psychological health of providers. According to Singh, Volner, & Marlowe (2021), burnout is becoming an epidemic and is characterized by emotional exhaustion, depersonalization, and a sense of reduced personal accomplishment. Providers are not immune to stress, trauma, and burnout.

When we combine high levels of stress with exposure to secondary trauma providers are also at risk for compassion fatigue (Cocker & Joss, 2016). Compassion fatigue is a common response to long-term/intense exposure to trauma. Common symptoms include feeling anxious, intrusive thoughts, hypervigilance, numbness, a feeling of nothing left to give (Clay, 2020) Alternatively, we experience compassion satisfaction, which is when you feel job satisfaction and work-life balance. Compassion satisfaction is a protective factor against compassion fatigue (Thapa et al., 2021).

In most healthcare settings, providers are exposed to regular, prolonged, and intense amounts of stress and secondary trauma. When we look at the factors responsible for provider burnout and compassion fatigue there are several factors that are correlated which include: increased work hours, provider shortages, bureaucratic/administrative work, electronic health records, failure to achieve work-life balance, increased focus on productivity, lack of leadership support, lack of meaningful work, lack of collegiality at work, lack of individual and organizational value alignment, and lack of flexibility/work control (Singh, Volner, & Marlowe, 2021). These factors pose a challenge to the psychological health of those working to help promote mental wellness, all of which are primarily organizational factors.

So how, do we promote healthier work environments. Other organization have found that flexible work hours, career growth opportunities, management support, effective leadership, networking, continuous workplace improvement programs, peer support programs all help to promote healthy and compassionate workplaces (Thapa et al., 2021). Another helpful tool has been to apply [Stress First Aid](#) within an organization. Stress First Aid helps to catch early warning signs of severe stress and helps people to get support when needed by creating a common language and communication tool for identifying the impact of stress.

The National Center for PTSD developed the Stress Continuum model as a key component of the Stress First Aid program. This model is used widely among the military, first responders, and healthcare professionals, and aids people in these helping professions to identify and address signs of stress early and continuously. Since stress is continually changing depending on the environment and the experiences we encounter, it has been found to be supportive tool (Watson, P., & Westphal, R.J., 2020).

Sometimes we forget to pay attention to our own stress, and we are unaware of which stress zone we are in as we get wrapped up in the demands of life (Watson, P., & Westphal, R.J., 2020). The first step in caring for ourselves and others is awareness. If you find yourself in the orange or red zone, you are not alone – at least 50% of providers report symptoms of burnout (Singh, Volner, & Marlowe, 2021). It's also important to look out for colleagues and find ways to communicate when you notice someone is struggling.

According to Stress First Aid (Watson, P., & Westphal, R.J., 2020), the five essential elements to recover from stress include:

1) Promote a sense of safety

It's critical to establish and maintain psychological safety at work. Psychological safety is the belief that one can speak up without risk of punishment or humiliation.

2) Promote calming

Some stress is beneficial for us, but when it becomes overwhelming and constant, it becomes a problem. Physiological symptoms such as increased heart rate, blood pressure and respiration are associated with disruption in sleep, lack of hydration, poor decision-making, and long-term health problems. Each day, it is important to help calm the nervous system. What is calming for one person (i.e. deep breathing) may not be calming for another. It's important to find what works to help calm your nervous system, and then do it daily.

3) Promote connectedness

Social connections continue to be one of the strongest protective factors against stress and helps to promote both physical and emotional well-being.

4) Promote sense of self and collective efficacy

A person's confidence in their ability to handle stressful events, and solve problems helps a person to recover more quickly from stressful events.

5) Promote a sense of hope

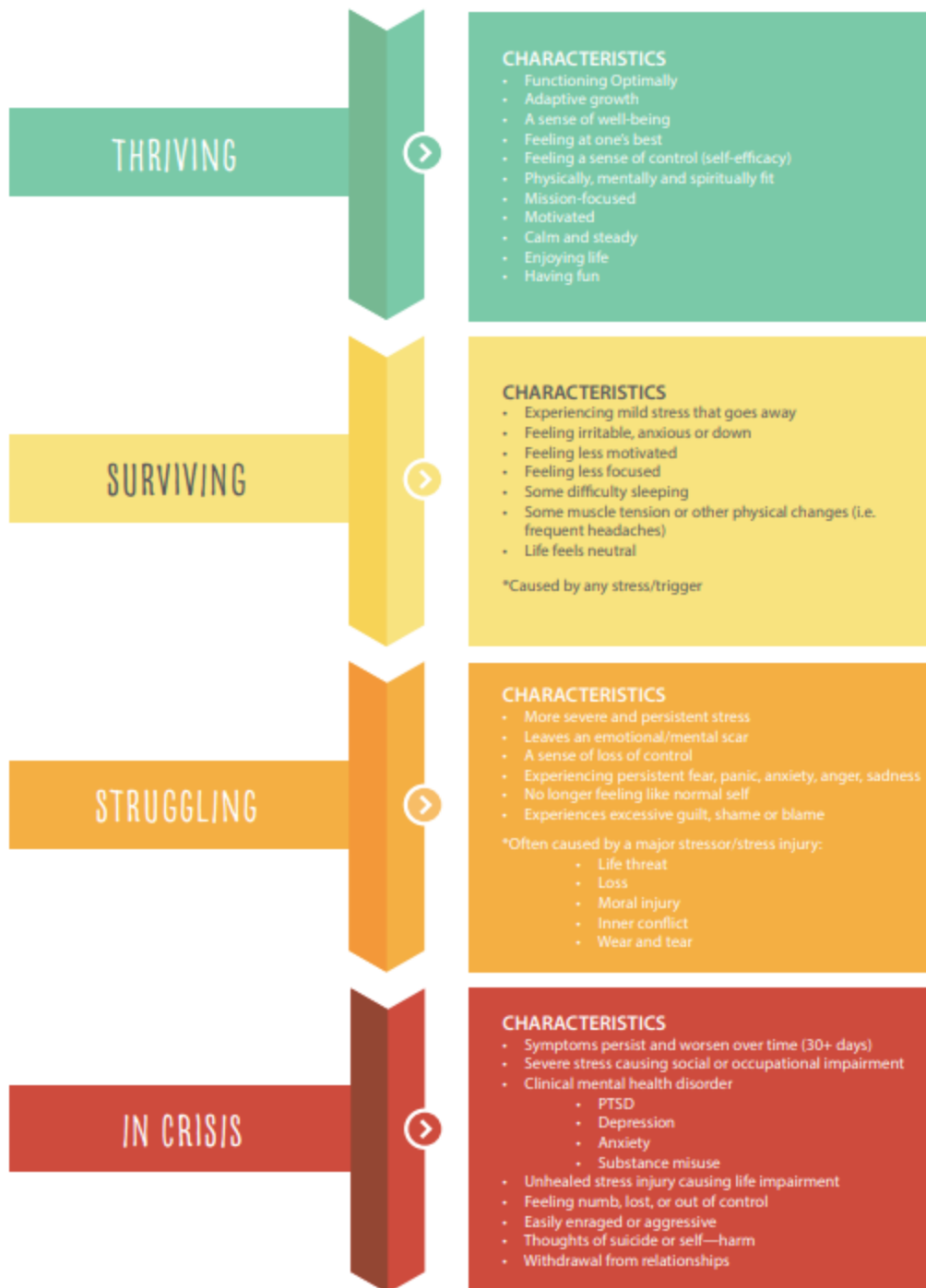
Having a sense of hope promotes optimism, faith, and a belief that things will work out in the best possible way.

As you may have noted none of these elements are prescriptive. You are a master at handling stress, and yet sometimes life pushes us over our threshold for managing stress effectively. You know what works best for you. Taking time to pause, assess what is happening, and make a plan that feels reasonable can help us to deal with stress when it becomes too much. Our brains are wired to want certainty, our ability to plan/problem solve is hindered during times of uncertainty. If you find yourself feeling stuck or

ruminating about a problem – perhaps shorten the length of time you are planning/ problem solving for.

Heather Haslem received her bachelor's and master's degrees from the University of Nevada, Reno, in Psychology and Human Development & Family Studies, with an emphasis in Gerontology. She is a Duke University trained Integrative Health Coach, a National Board-Certified Health & Wellness Coach (NBC-HWC), and a Certified Wellness Professional. In addition, Heather is Certified in Mind-Body Medicine, Mindfulness-Based Stress Reduction, and Yoga. With over a decade of experience in building programs that enhance whole-person wellbeing, she works with first responder organizations to support their health & well-being. She is dedicated to supporting people, organization, and communities in creating a culture that supports whole-person well-being. She was a keynote speaker at the NSFA Conference in Elko in 2023.

STRESS CONTINUUM MODEL



Adapted from the work of Patricia Watson, PhD; National Center for PTSD.



Its Ok not to be OK, A Personal Story

I am going on 40 years in the volunteer fire service. Like most all I trained to be prepared to be the best of a team in adverse environments.

Over the years like all, I have responded to calls all hours of the day and night. Some were calls that totally wore me out and others I returned to work ready for another call.

I was truly blessed to have as many mentors as I did in my development as an FF/EMT. I was frontline structure attack, Engineer, RIT, High Angle Rescue, Water Rescue, Wild Land, Dozer Boss, Mechanic on emergency vehicles, heavy construction equipment, (almost anything with an engine), EMT, and like most the list goes on. I wore a white helmet for 13 years as VFD Fire Chief. Like 70+% of firefighters in America, I am a Volunteer Firefighter.

Over the years many things have changed in the Fire Service. Most all for the good. I achieved my Level 1 & 2 Fire Instructor certification and as I tell firefighters, I am perfect candidate to be a "dinosaur". This meaning, I have been doing it this way for years and I am still here to talk about it. The truth is, by the grace of God I am still here to tell what we did wrong over the years. The most attention grabber is when I tell firefighters that always putting our Nomex in the crotch of our turnout pants was a cause for testicular cancer. Yep, eyebrows raised thinking the boys were in danger. Today firefighters have two sets of turnouts. After the fire turnouts are collected in plastic bags and placed in a vehicle where firefighters do not ride. Firefighters wear other cloths while in the rig. We have learned how carcinogens get collected over time from one surface to another.

Medical calls are another that has evolved to better understand pathogens and how to avoid transferring of bad stuff. We have learned how to clean an ambulance and all the items we used that need to be bio contained or disinfected. There is ton of bad stuff we have the potential to be exposed to on every call.

Carcinogens and pathogens are only part of what can affect us. We are exposed to many mental health situations. We are trained to know how to save people from bad situation or treat injured people. Like carcinogens and pathogens, repeated exposure makes it worse. The same is for mental health situations.

We have learned that it is “OK not to be OK”. The greater concern is not knowing when we are not OK.

My personal story is just that! I did not now I was not OK. I had a few calls in my past that popped into my mind from time to time but I knew that was normal for FF/EMT's. Thinking back there was one happening that pushed me a little deeper into my not being OK. No one knew it. My wife, kids, friends, brother and sister firefighters, no one knew, or so I thought.

I had the opportunity to have the lead in organizing our 87th annual Nevada State Firefighters Association (NSFA) training conference. I designed our challenge coin. Chief Jeremy Loncar added ideas of silver color, being Nevada is the “Silver State”, and the “V” for Virginia City that has been visible on the Mt Davidson since the 1920's. The perimeter of the challenge coin reads. “Remembering LODD Never Forgotten”.

I had the coins made and when I received the coin's I took one out of the bag and held it in my hand. It was right then I began the closure to all the “Its OK not to be Ok that was deep in me. The only explanation I can think of is I knew right then and there all the years being an FF/EMT were for the good and that that bad things happen that I had no control over. The strength I drew from holding the coin in my hand was amazing.

I told my wife how different I felt after holding that coin. I was surprised how she smiled and gave me a hug telling me she had seen little subtle changes in me that she could not explain. I have been married to her for longer than I have been a firefighter, and she is also a firefighter.

I have no words of wisdom of how to know there may be “Its OK not to be OK” building up inside you. What I can truly say is, you are not alone. We are firefighters! We save people! I am going to claim this quote that I have told young FF/EMT's. “You did not ask for that to happen – You did not cause that to happen – You were the first there to help to make a bad situation better”.

Mentor those who come into the fire service behind you. You may not have all the answers but your personal experience may be just what a brother or sister needs when “Its OK not to be OK” situations happen.

As my years in the fire service have grown, so has the realization I am not as young as I once was. Reading glasses, hearing aids, neuropathy, bigger waistline, all leads to time to begin to slow down.

It took a few months of convincing, but Jeff Goldsworthy is now Chief Jeff Goldsworthy. Jeff is doing awesome leading the Storey County VFD. Storey County is a combination department. Chief Loncar and Chief Goldsworthy are keeping the heritage of the Storey County FD, (Now Fire Protection District) strong and community minded. I would be terribly remiss if I did not mention a local fellow named Joe Curtis. Joe is just around the corner of being an active Storey County VFD for 50 years. Joe has said he will retire after 50 years. Joe is just like the rest of us, we never really retire.

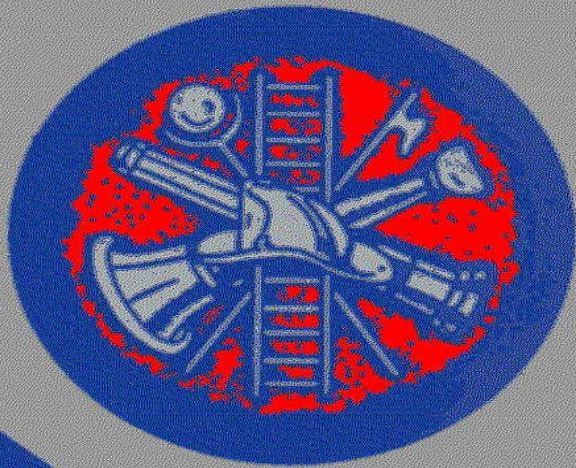
Train, train, and train more. By the grace of God people like Joe Curtis, Mike Heidemann (NSFA Executive Director), Mark Flesher (Past President NSFA) and me and many others are still here to help a brother or sister be the best of the team they can possibly be.

Al Drake
Redgranite WI VFD
South Bryan County GA VFD
Storey County NV VFD
NSFA Past VP Director



NEVADA STATE

FIREFIGHTER'S



ASSN.

New Firefighter License Plate

The Nevada DMV has released the new Firefighter license plate

The new FF plate will replace the VF plate due to a stacked letter conflict between Volunteer Firefighters and Air Force Veterans. This conflict didn't bode well for anyone with either plate. If you shared a similar plate with an Air Force Veteran, you could get their speeding tickets and warrants for not appearing in court!

The new plates will be rolling out sometime in July and those of you who already have a non-personalized VF plate will automatically have one mailed to you for replacement.

As you may know, the fees for the now-retired VF plates and the new FF plates go towards training for volunteer firefighters in Nevada. So starting the end of December, go forth and get your new Firefighter plates to help support volunteer firefighters across Nevada.



Nevada State
Firefighter's Association

THE PUMPER

BY: AL DRAKE



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