



FEMA

2011
June 26, 2011

NIOSH Docket Office
Robert A. Taft Laboratories, MS-C34
4676 Columbia Parkway
Cincinnati, Ohio 45226

NIOSH Docket Office
Docket Number NIOSH-063B

Thank you for the opportunity to provide input on the Fire Fighter Investigation and Prevention Program (FFFIPP). The United States Fire Administration (USFA) is pleased to offer our continued support for the work being done at NIOSH to improve fire fighter safety and health across the Nation. Please review and consider the following recommendations and general comments:

Recommendations:

- NIOSH examine fatigue as a possible factor when conducting firefighter fatality investigations. We recommend NIOSH look at adopting procedures similar to those used by the National Transportation Safety Board (NTSB) when investigating transportation related accidents resulting in fatalities. Researchers have studied factors that affect fatigue, such as duration and quality of sleep, shift work and work schedules, circadian rhythms, and time of day. Sleep disorders and the characteristics of sleep patterns at different ages have also been studied. Cumulative sleep loss and circadian disruption can lead to a physiological state characterized by impaired performance and diminished alertness. Fatigue can impair information processing and reaction time, increasing the probability of errors and ultimately leading to accidents. Mitigation programs can be adopted if we have a better understanding of how fatigue may have played a role in serious injuries and fatalities.
- Cross referencing to USFA research and reports in NIOSH firefighter fatality investigations reports to the extent practicable would be welcomed. (<http://www.usfa.fema.gov/research/safety/>). We recommend NIOSH include mention (and hyperlinks) to relevant USFA Firefighter Health and Safety Initiatives (training, research, and/or program) for many reports they are developing related to particular on-duty firefighter fatalities. USFA initiatives in this area include Health and Wellness, Emergency Vehicle Safety, Roadway Operations Safety, Protective Equipment Research, etc. NIOSH has included reference to some USFA reports in the past for some investigations, mostly trauma related (i.e. the USFA Safe Operations of Fire Tankers

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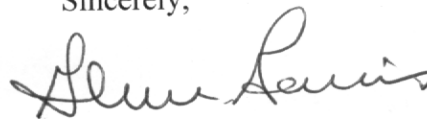
manual is regularly mentioned in NIOSH Firefighter Fatality Reports where fatalities were from vehicle crashes related to these vehicles). We recommend this practice continue and encourage reference to more relevant USFA programs in NIOSH reports. Please feel free to contact USFA's point of contact: Mr. Bill Troup (Bill.Troup@dhs.gov, 301- 447-1231).

General Comments:

- Each year there are more than a quarter of a million visitors to the firefighter fatality section of the USFA web site. Internet URL links to the high quality NIOSH Firefighter Fatality Investigation and Prevention Program reports are included for every individual case where an investigation has been completed.
- The annual USFA Firefighter Fatalities in the United States report includes an appendix with a brief summary of each fatal firefighter fatality incident. When available, USFA includes a link to the specific and more detailed NIOSH report for the incident being discussed.
- USFA firefighter fatality incident summaries are brief by design. We rely on the NIOSH reports for details that can expand the understanding of the reader, better inform the fire service, and help challenge and direct prevention efforts.
- At USFA's National Fire Academy, NIOSH reports are used as case studies in several courses and are required reading for some class assignments.
- USFA's National Fire Data Center and our research partners have used NIOSH reports in studies of health and wellness initiatives, roadway operations safety, and emergency vehicle safety.

Please feel free to contact me if there are any questions regarding the USFA's recommendations and comments.

Sincerely,



Glenn A. Gaines
Deputy Fire Administrator
United States Fire Administration