



June 3, 2019

Statement from Secretary-designee Crim on the Impact of SPS 330 on Public Sector Fire Departments

In the months since last October, when updates to the state of Wisconsin's Fire Safety and Health Program rules—known as SPS 330—went into effect, public fire departments throughout the state have been working to understand its impact on individual fire service members and the communities they serve.

Small, rural, and volunteer fire departments and town officials have raised questions about whether the rule update is placing an undue and unfair burden on communities with fewer resources. Education and training requirements, as well as standards for equipment operation and maintenance, are among their top concerns.

To be clear, the education and training requirements for firefighters have not changed from the previous standards. The new rules maintain current training requirements and fees, and the two-percent dues—annual state subsidies to public fire departments—continue to cover the cost of the entry level firefighter course, entry level driver operator pumper/aerial course, and the fire officer course.

In addition, SPS 330 does not require certifications for firefighters, apparatus operators, or fire officers. The same applies to instructors—there are no certification requirements, though they must be qualified to teach in their area of expertise, as well as be familiar with the fire department, its organization and operations. In order to satisfy training requirements, instructors as described above are permitted to train fire personnel to meet NFPA 1001 standards. Departments must thoroughly document that fire personnel have been trained to meet all the components consistent with the Job Performance Requirements (JPR) as described in NFPA 1001.

Certain provisions deemed to be burdensome for small, rural, or volunteer fire departments were amended or repealed in the rule update. For example, the rule changed weekly apparatus and portable equipment inspections to once every month and created exceptions for the seven-year tire replacement. The rule also eliminated the requirement to destroy training rope after use and allows for the reuse of life safety rope under certain conditions. In addition, unused life safety rope no longer requires annual recertification.

The previous rule allowed for grace periods within the training standards, however, firefighters were never permitted to participate in structural firefighting that put them in proximity to hazards until they had completed appropriate training. The grace periods have been removed in order to comply with state law requiring that our standards be equal to or better than the federal Occupational Safety and Health Administration (OSHA) regulations.

The rules were revised in consultation with an advisory committee representing career, volunteer and combination fire departments from across the state, including Campbell, Onalaska, Manitowoc, Wauwatosa, the town of Sun Prairie, and Plymouth. The Department also reviewed similar rules in neighboring states and consulted with members of associations and local volunteer fire departments to ensure the rules would not impose an undue hardship on them.

Throughout the seven-year process, which included a year of public comment and input, our number-one priority was to better protect our firefighters who risk their lives to ensure the safety of the citizens of Wisconsin. We are proud to say that the updated SPS 330 aligns Wisconsin's minimum safety and health standards with OSHA and National Fire Protection Agency (NFPA) standards.

We encourage all fire service professionals and town officials to reach out to us, ask questions, and talk to your local Department of Safety and Professional Services inspector or coordinator about how the new rules will impact your communities.

We're here to help protect your safety and health so you can protect the communities you serve.

Sincerely,

A handwritten signature in cursive script that reads "Dawn B. Crim".

Dawn B. Crim