



# Michigan Association of Fire Chiefs

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August 4, 2020

LARA/Bureau of Fire Services  
Attn: Michigan Fire Fighters Training Council  
PO Box 30700  
Lansing, MI 48909  
Sent: Via Email

Dear Members of the Michigan Fire Fighters Training Council,

At the July 28, 2020 Michigan Fire Fighters Training Council (MFFTC) General Rules Workshop it was decided that the proposed rules will be brought forward for a vote to move forward. Before the Rules move forward, we would like to express our position regarding reciprocity, continuing education and course attendance.

## **Recognition/Reciprocity of Certification - In State**

As currently written, the rules still do not offer reciprocity for in-state firefighters obtaining Pro-Board certification in the future after the effective date of these Rules.

The MAFC is asking that the MOU is written as such that the State will waive certification examination to anyone holding a Pro-Board certificate and RAFT will allow any individual holding a State Certification, after the effective date of these rules, an individual can pay a fee and have a portfolio review done to receive a Pro-Board Certification, as is the common practice in Illinois and Texas. Many Departments in the State utilize RAFT for Pro-Board certification (as the certification agency for the Pro-Board in many disciplines in the State). Is it the intent of the Council to create MOU's with MSP for Fire Investigator, Hazardous Materials Technician and NFPA for Fire Inspector? If the Council isn't going to establish MOU's stating that each course for these disciplines has to be registered in the Bureau's information management system, then this seems a way to micromanage one particular Pro-Board accredited organization.

The proposed rules still create a significant disadvantage for our in-state fire service members who take a class from a nationally recognized organization but will not receive the same certification as an out-of-state member looking to move to Michigan who took the same class. When a person from Michigan goes to Alabama Fire College

and takes a course for any reason maybe, timeliness, convenience or any other reason, i.e. (Instructor II, ARFF or Fire Officer II), they can sit next to a person from Ohio both successfully complete the course. The Michigan person comes back and can't get State certification but the Ohio person moves here a year from now and is issued reciprocity as long as they don't have a felony and are in good standing in the State they came from.

The Michigan Association of Fire Chiefs believes the rules need to be compliant with Public Act 291 and consistent with the intent of the Michigan Fire Service Coalition, who developed the bill. We request the MFFTC recognize all courses successfully completed from all organizations that are accredited by a nationally recognized agency, such as Pro Board, International Fire Service Accreditation Congress (IFSAC), National Fire Academy (NFA), and the Michigan State Police for all fire service disciplines.

### **Continuing Education Requirements**

The Michigan Association of Fire Chiefs agree firefighters in Michigan should receive and document continuing education to ensure they are maintaining skills. We request the MFFTC recognize the need for fire and public safety departments to provide continuing education commensurate and specific to each department's duties, which meet MIOSHA requirements without stipulating hours or subject matter. The fact that a set amount of hours is being proposed could potentially set a department up for failure if a MI-OSHA inspection/investigation were to occur due to an incident. A department would say we met the twelve hours annually set forth by the MFFTC, but MI-OSHA determines that to be inadequate. We understand that during the town hall meetings, many ideas of how many hours were generated because that is what was asked of each individual in attendance. We maintain along with MI-OSHA Part 74, PA 291 and NFPA that training should be competency based, specific to the duties expected to perform.

### **Course Attendance Requirement**

The Michigan Association of Fire Chiefs is in full support of the MFFTC and Bureau of Fire Services (BFS) ensuring that each and every fire service member meets the necessary requisite knowledge and skills identified in each professional qualification standard. This is accomplished by successful demonstration of requisite skills and a written or oral examination that evaluates/tests a fire service member's competency in relation to the applicable standard. While the traditional method is easy to fall back on, it is not the only way. In fact, there are a variety of ways students can be successful at achieving competency. To artificially limit how someone accomplishes the same objective(s) is unnecessary and detrimental. A fire service member reviewing the material on their own, with trained personnel in their department or by attending a college class or program are all ways in which they could gain the requisite knowledge and skills to successfully demonstrate competency in compliance with the referenced standard.

Society's movement toward alternative learning methods increase the chance of an individual with very limited time or with exigent circumstances to accomplish the necessary certifications to be a firefighter, fire officer or any other fire service discipline.

The Michigan Association of Fire Chiefs remains committed to staying engaged in the rules process. We believe strongly that these concerns need to be addressed. If you have any follow up questions, please feel free to reach out to me to discuss.

Thank you,

A handwritten signature in black ink, appearing to read "Jeff Roberts". The signature is written in a cursive, flowing style.

Jeff Roberts  
President  
Michigan Association of Fire Chiefs

CC: Donald Bigger, President - MFSIA  
Keith Berg, President - MSFA  
Mark Docherty, President - MPFFU  
Chris Dixon, President - MFIS  
Brenda Moore, President - MML  
Jeffrey Sorensen, President - MTA