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**Department of Administrative Services
Testimony on Raised Bill 5150 AAC Fire Safety Enforcement Officials**

**William Abbott, State Fire Marshal
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Compliance
Public Safety & Security Committee
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The Office of the State Fire Marshal (OSFM) and the Office of the State Building Inspector (OSBI) are currently part of the Department of Administrative Services (DAS). OSFM, OSBI and DAS (together, the "agency") would like to thank the Committee for allowing us to provide comment on Raised House Bill 5150.

HB 5150 is offered on behalf of the local fire marshals. This proposal has been a topic of on-going discussions between the proponents and the agency, specifically State Fire Marshal, and the Office of Education & Data Management, which administers the process for the certification of fire safety enforcement officials.

Section 1 of HB 5150 includes a prior technical agency submission to address administrative confusion by proposing the deletion of the separate "eligible to be certified" status. The agency appreciates and supports the inclusion of these changes. Presently, pursuant to statute (C.G.S. 29-298), after completing a recognized training program, the Office of State Fire Marshal certifies individuals as "eligible to be certified." The inconsistency is that the statute does not allow a community to hire an individual unless the person is "certified;" and it is further complicated by the fact that one cannot be certified until hired by a community.

Eliminating the separate "eligible to be certified" status would eliminate this confusion and inconsistency in the statutes, and would make processing of credentials uniform and more efficient. The individuals who have passed the certification examinations, but are not appointed (employed), would be certified. Certification would be based on successful completion of credentialing exams, which is similar to the process for Building Officials.

Section 1 of HB 5150 also proposes to include the Fire Marshal Training Council and remove the Codes & Standards Committee from its current role in working with and advising the State Fire Marshal on qualification standards and certification processes.

These provisions run counter to the efforts of the Governor and the state to have a unified Fire Safety, Fire Prevention, & Building Code, and the agency does not support them. OSFM and OEDM staff appreciates and respects the contributions that the Fire Marshal Training Council provides on certification processes and training recommendations. However, with its statutorily defined advisory role to the State Fire Marshal and the Codes & Standards Committee, and its two appointments on the Committee from the local marshal community, the agency believes that the Fire Marshal Training Council is already equitably represented. The Codes & Standards Committee provides an invaluable resource to both the fire and building communities with regard to certifications and Code plan review, and the agency does not support replacing the Codes & Standards Committee with the Fire Marshal Training Council in these areas.

Furthermore, the agency would like to point out that replacing the Codes & Standards Committee with the Fire Marshal Training Council to establish standards and certifications would make the process used by the fire professionals inconsistent with that used by the building officials; and it is the agency's understanding that the proponents seek to be treated similarly to the building officials. The Codes & Standards Committee works with the State Building Inspector on matters pertaining to certification and standards for building officials (see C.G.S. § 29-262) -- not the Building Advisory Council, the Fire Advisory Council's equivalent in these matters.

Finally, the bill adds prerequisite standards to the certification statute for local fire officials. It is our understanding that the proponents believe that such standards should be codified in statute "like the building officials." The agency might agree that some prerequisites make sense. The exact categories, however, should be based on some diligent investigation by the agency and should include the input of the Codes & Standards Committee as that committee is statutorily charged with adopting minimum standards for qualifications for local fire marshals jointly with the State Fire Marshal. In addition, DAS has always been upfront with the proponents that codification of these requirements in statute is likely to result in a state cost since several state employee job specifications may require changes.

The agency may support codification of standards in the certification statutes if the bill were amended to include some flexibility by the Commissioner in determining equivalent experience. Specifically, in line 16, after "department" the agency would request the inclusion of "; or equivalent experience as determined by the Commissioner of Administrative Services." This addition would assist in minimizing the fiscal impact of adding new requirements to state job classifications.

Without the additional language requested above, DAS would have to amend a number of state job classifications to include the new pre-requisites, increasing the level of qualifications needed for the state to hire individuals in these classes. Doing so most

often increases the associated pay scales for these jobs. The job classes at issue include, but may not be limited to: Building & Fire Safety Inspector 1; Building Plan Reviewer (Code Compliance); Building & Fire Safety Inspector 2; Fire & Life Safety Specialist; Fire & Life Safety Supervisor; and State Fire Marshal. Other job classes and series may be impacted as well.

The agency cannot support Raised Bill 5150 in its current form. The agency's offer to work with the Committee and proponents remains available and we look forward to the opportunity to discuss these matters further.

Thank you for the opportunity to provide comments. Please don't hesitate to contact Terrence Tulloch-Reid, terrence.reid@ct.gov if the Committee has additional questions.

