**OSHA COMMENT TEMPLATE**

**For Volunteer Fire & EMS Departments**

***DIRECTIONS:***

*Choose, one, two, or three items/issues to address. Don’t get bogged down trying to comment on the entire proposal. For each item, write one or two paragraphs describing how your department lacks the ability to comply. It is okay to submit multiple comments. As you identify new hardships or pain points, submit additional comments.*

***SAMPLE LETTER***

I am writing to object to the proposed OSHA regulations for fire brigades as written. I am writing on behalf of the XYZ Fire Department in (STATE).

The XYZ Fire Department is a volunteer (or small combination) fire department with the following characteristics:

* XXX volunteer firefighters/EMS providers.
* (IF ANY) XXX career firefighters.
* Responds to about XXX emergency calls each year.
* Serves a town (city, parish, county, etc.) with a population of XXXX people.
* Responsible for an area of XXX square miles.
* Has an annual budget of $$$$$$.
* (If you provide ambulance service) We operate a (BLS or ALS) ambulance for our community.
* (If appropriate) We have no administrative staff.
* (If appropriate) Our fire chief is a volunteer/part-time.

The funding for our annual budget comes from the following sources:

*(Fill in your percentages and add any missing categories)*

* Tax Dollars 0%
* Fundraising 0%
* Grants 0%
* Subscriptions 0%
* EMS Billing 0%

The XYZ Fire Department lacks the financial resources and lacks the administrative staff to comply with the proposed OSHA regulations. One item of particular concern is:

Proposed Rule:

*Ex: All Fire Officers Must be Trained to NFPA 1021, Standard for Fire Officer Professional Qualifications*

Why this is of concern:

*Ex: Can your fire department provide this level of training to all your current and future officers? Does your budget support this? Are there classes available on nights and weekends? How far will your officers have to travel?*

We oppose this because:

*Ex: There is no significant risk to the health and safety of firefighters that requires all fire officers to take this training. The training mostly includes topics that have little or no bearing on firefighter safety such as:*

* *Preparing budgets*
* *Developing a financial management system*
* *Answering public inquires*
* *Purchasing and finance (public bidding)*
* *Writing media releases and administering public relations programs*
* *Hiring policy and procedures*
* *Providing for ADA accommodations*

I urge OSHA to reconsider this proposal as written.

Thank you,

John Doe, RANK

XYZ Fire Department