



Prince William County, Virginia Internal Audit Report – Fire and Rescue System: Firefighter I and II Certification Course Compliance Audit

August 4, 2017



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TRANSMITTAL LETTER



August 4, 2017

The Board Audit Committee of
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Pursuant to the Internal Audit Plan for Fiscal Year (“FY”) 2016-17 for Prince William County, Virginia (“County” / “PWC”), approved by the Board of County Supervisors (“BOCS”), we hereby present the internal audit of the Firefighter I and Firefighter II (“FF I & II”) certification course provided outside of the County’s Public Safety Training Center (“PSTC”) May 2016. We will be presenting this report to the Board Audit Committee of Prince William County at the next scheduled meeting on December 5, 2017.

Our report is organized into the following sections:

Executive Summary	This provides a high-level overview and summary of the observations noted in our internal audit of the FF I & II certification course provided outside of the County’s PSTC May 2016.
Background	This section provides an overview of training provided to the County’s Fire and Rescue Association (“FRA”), as well as relevant background information.
Objective and Approach	The objectives of this internal are expanded upon in this section, as well as a review of our approach.
Observation Matrix	This section includes a description of the observations noted during our internal audit and recommended actions, as well as Management’s response including responsible party, and estimated completion date.

Effective August 1, 2017 the Board of County Supervisors repealed Chapter 9.1 and adopted Chapter 9.2., subsequent to this field work and report preparation, and therefore some of the citations refer to the former ordinance. While the FRA was disbanded in Chapter 9.2, the policies and procedures used to govern the FRA are being updated to reflect the Fire and Rescue System Chief model newly adopted by the BOCS.

We would like to thank the staff and all those involved in assisting our firm with this internal audit.

Respectfully Submitted,

RSM US LLP

Internal Auditors



EXECUTIVE SUMMARY

Background

The Firefighter I & II certifications are the minimum requirements needed to become a firefighter, staff a basic fire engine and participate in active incidents in PWC. These two (2) certifications are the foundation that all additional training, certifications and promotions to higher rank are built upon. In addition, the certifications are the building blocks to advance on to equipment that is more complex. Therefore, it is critically important for system-wide consistency in FF I & II training and certification. This, in turn, provides greater value and return on the training investment to the firefighters of PWC's Fire and Rescue System.

PWC maintains the PSTC, which is shared jointly with the County's Police Department. The PSTC is used for all certification training, and the Department of Fire and Rescue ("DFR") is responsible for monitoring training and certifications for all members, both career and volunteer ranks. While the County's Volunteer Fire Departments ("VFDs") are encouraged to use the PSTC, as long as they follow the curriculum prescribed by County Ordinance No. 09-51, dated August 4, 2009, Chapter 9.1 ("Chapter 9.1"), the Virginia Department of Fire Programs ("VDFP") standard (as applicable) or the Fire and Rescue Association ("FRA") curriculum (as applicable), they may go outside the County's PSTC for their training needs.

In May 2016, Buckhall Volunteer Fire Department ("BVFD") and Cherrydale Volunteer Fire Department, a VFD in Arlington County, funded the FF I & II certification course, and training was held at BVFD and led by the BVFD Fire Chief.

This certification course was considered "unfunded" by PWC, rather than a "delegated authority" class. As such, the VDFP was responsible for making payment to the instructor(s). The certification course was not only for the benefit of fire and rescue members within the County, but additional VFDs outside PWC.

Overall Summary / Highlights

The observations identified during our assessment are detailed within the pages that follow. We have assigned relative risk or value factors to each observation identified. Risk ratings are the evaluation of the severity of the concern and the potential impact on the operations of each item. There are many areas of risk to consider in determining the relative risk rating of an observation, including financial, operational, and/or compliance, as well as public perception or 'brand risk'.

Objective and Scope

The objective of this internal audit was designed to assess whether the FF I & II certification course provided outside of the PSTC in May 2016 was in compliance with the County's Chapter 9.1.

Services and scope of work focused on the following:

- Gaining an understanding of the curriculum of the FF I & II certification course provided outside of the PSTC;
- Comparing and contrasting curriculum conformity to training provided by the PSTC, including inspection of apparatus utilized as part of the training;
- Assessing compliance with Chapter 9.1;
- Determining compliance with testing standards for successful student completion of course curriculum;
- Assessing sufficiency of the records and documentation maintained; and
- Gaining an understanding of PWC's "delegated authority" designation from the VDFP, with responsibility and accountability for retaining status, including curriculum standards, instructor certification and retention of status.

Fieldwork was performed during March 2017 through July 2017

Summary of Observation Ratings

(See page 3 for risk rating definitions)

	High	Moderate	Low
FF I & II Certification Course – Compliance Audit	2	-	-



EXECUTIVE SUMMARY – CONTINUED

Observations Summary

There were two (2) observations identified during this internal audit. Below includes a listing of the observations that were identified. Detailed observations are included in the observations matrix section of the report.

Summary of Observations	
Observations	Rating
1. Compliance with Training Obtained Outside of the PSTC	High
2. Fire and Rescue Association Policy 4.5.1 Uniform Rank Structure Semi-Annual Certification Compliance Monitoring	High

Provided below is the observation risk rating definitions for the detailed observations starting on page 11.

Observation Risk Rating Definitions	
Rating	Explanation
Low	Observation presents a low risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of low importance to business success/achievement of goals.
Moderate	Observation presents a moderate risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of moderate importance to business success/achievement of goals. Action should be in the near term.
High	Observation presents a high risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of high importance to business success/achievement of goals. Action should be taken immediately.



BACKGROUND

Today's firefighter is more than a person with a helmet and a fire hose. Modern day firefighters go through months of training to receive basic certification that must be supplemented with ongoing education. The Firefighter I & II certifications are the minimum requirements needed to become a firefighter, staff a basic fire engine and participate in active incidents in PWC. These two (2) certifications are the foundation that all additional training, certifications and promotions to higher rank are built upon. In addition, the certifications are the building blocks to advance on to equipment that is more complex. Therefore, it is critically important for system-wide consistency in FF I & II training and certification. This, in turn, provides greater value and return on the training investment to the firefighters of PWC's Fire and Rescue System.

PWC maintains the PSTC, which is shared jointly with the County's Police Department. While the County's VFDs are encouraged to use the PSTC, as long as they follow the curriculum prescribed by Chapter 9.1, the VDFP or the FRA curriculum, as applicable, they may go outside the PSTC for their training needs. The PWC Department of Fire and Rescue (DFR) is responsible for monitoring training and certifications for all members, both career and volunteer ranks.

In May 2016, BVFD and Cherrydale, a VFD in Arlington County, funded the FF I & II certification course, and training was held at BVFD and led by the BVFD Fire Chief.

Virginia Department of Fire Programs

The VDFP is one of eleven agencies within the Commonwealth of Virginia's Secretary of Public Safety and Homeland Security. The Virginia Department of Fire Programs provides:

- **Funding:** The VDFP provides financial assistance to Virginia's fire services through the distribution of the Aid-to-Localities ("ATL") grant program as well as through various other grant programs (i.e. Live Fire Training Structure grant).
- **Professional Development:** As a nationally accredited fire service training entity in Virginia, the VDFP provides training programs for both career and volunteer emergency responders throughout the Commonwealth.
- **Research:** As the managing agency for the Virginia Fire Incident Reporting System, the VDFP is responsible for data collection, analysis, and information reporting to Virginia's fire services, Virginia's policy makers, and nationally to the National Fire Incident Reporting System. The VDFP also utilizes the data it collects to both identify and promote fire services best practices.
- **Operational Support & Technical Assistance:** As a Virginia Emergency Support Team agency, VDFP provides both operational and technical assistances to communities in need during emergencies of all types. This includes both support in the Virginia Emergency Operations center and in-the field.
- **Fire Prevention Inspections:** The State Fire Marshal's Office has the responsibility of protecting life and property for the citizens of the Commonwealth through the utilization of inspectors to complete fire safety inspections; by conducting building plans reviews for fire safety measures; and by conducting construction inspections for fire safety systems in all state buildings.

VDFP also provides technical assistance and consultation services to Virginia's localities through the completion of fire and emergency medical services ("EMS") studies. The VDFP, in collaboration with the Virginia Fire Services Board, Department of Forestry and Office of Emergency Medical Services, performs Fire and EMS studies. These are at the request of a locality to examine various operational and organizational issues within the locality.

National Guidelines and Accreditation

In addition to specific standards established by Chapter 9.1, PWC must adhere to, at a minimum, standards identified by the VDFP for training and certification. These standards are outlined by the National Fire Protection Association ("NFPA"). The NFPA is "A global nonprofit organization, devoted to eliminating death, injury, property and economic loss due to fire, electrical and related hazards." In part, they are an education partner with over 60,000 members worldwide. The basic core requirements to become a firefighter in the U.S. is outlined in NFPA Standard 1001, for Firefighter I and Firefighter II training.



BACKGROUND – CONTINUED

Virginia Department of Fire Programs – continued

National Guidelines and Accreditation – continued

NFPA's professional qualification standards are administered by the National Professional Qualifications Board ("Pro Board®"), whose stated mission is:

*"To establish an internationally recognized means of acknowledging professional achievement in the fire service and related fields. The **accreditation** of organizations that **certify** uniform members of public fire departments, both career and volunteer, is the primary goal.... accreditation is generally provided at the State or Provincial level to the empowered certifying authority of that jurisdiction."*

An entity that is accredited by the Pro Board® makes certification available to its members, whom become eligible to be entered into the Pro Board's® certification registry.

Delegated Authority

As previously noted, the VDFP provides "Aid-to-Locality" funding to each jurisdiction within the Commonwealth. There are various funding mechanisms for firefighting and emergency medical classes, but they are generally considered funded or unfunded classes. The definitions are as follows:

- *Unfunded:* The class is not included in the VDFP budget and is paid for by the respective fire department. Instructor wages are reimbursed by the VDFP.
- *Funded:* The class is included in the VDFP budget, based on the prior request and approval. All expenses associated with the course are reimbursed by the VDFP.

A jurisdiction can also file to be a "delegated authority", bypassing the need to wait for a funded class offered by VDFP or pay the VDFP directly for an unfunded class. PWC has opted to use their "Aid-to-Locality" funding of approximately \$800k per year for the PSTC to become a delegated authority for certain training programs. This delegated authority does not apply to all training classes, only the specific classes the VDFP approved and training provided at the PSTC, as long as the minimum VDFP requirements are included within the training curriculum. The PSTC is a delegated authority for the following VDFP courses:

- Hazmat Awareness
- Hazmat Awareness/Operation
- **Firefighter I**
- **Firefighter II**
- Driver Pumper Operator
- Fire Instructor I
- Fire Instructor II
- Fire Officer I
- Fire Officer II
- Aerial Operator

There are various benefits associated with being a delegated authority. For PWC, this includes the ability to conduct a class anytime resources and trainers are available and to fund the course without having to request VDFP approval and / or funding on a class/student level or train on the schedule of VDFP's classes. By PWC receiving a lump sum Aid-to-Locality allotment from the VDFP, the classes and administrative tasks are transferred from VDFP to the PSTC. The FRA Policy and Procedure 4.5.9 *Training Records and Internship Packets* acknowledges the delegated authority status.

For the delegated authority classes, the PSTC is responsible for maintaining all course documentation (i.e. attendance sheets, document sign-offs, quizzes and tests, etc.). The PSTC is also responsible for receiving and issuing Pro Board® certifications to the students that pass the course, and for providing the VDFP a summary list of individuals that passed the course for inclusion in the student's transcript, maintained by the VDFP.



BACKGROUND – CONTINUED

Delegated Authority – continued

Course Approval

If a delegated authority class is offered at the PSTC, it follows the curriculum approved by the FRA under Chapter 9.1 noted above or other FRA approved policies (as applicable) for specific training classes. It was recently noted by VDFP that while PWC is a delegated authority for certain classes, there has been an increase in requests for certification classes by the VFDs. The VDFP expressed concern that the VFDs' courses were being conducted without the knowledge of the PSTC, and without the appropriate curriculum to be followed (see **Appendix B** for correspondence).

VDFP courses have been requested within the County's boundaries (as with the FF I & II certification course held at BVFD), that were otherwise available as delegated authority classes, but were conducted as unfunded VDFP courses. These courses may not meet the minimum requirements and standards per Chapter 9.1. As an example, approved FRA Policy and Procedure 4.5.3 *Critical Standards for Fire Fighter I Class* have higher standards than the VDFP curriculum.

In a letter dated February 16, 2017, the County's Fire and Rescue Association established a new process with the VDFP for requesting and approving courses in PWC as follows:

"In an effort to coordinate course delivery and ensure that PWC specific curriculum is being followed, VDFP will route all future request for delegated authority courses to the PWC Public Safety Training Center. These requests will be coordinated with the PWC FRA Course Catalog and if found to fill an unmet capacity need advertised to all FRA departments. All instructor and course material will be routed to the PSTC for final course review and archival on behalf of VDFP."

The above does not apply to unfunded delegated authority classes that occur outside County boundaries, and may be attended by PWC Firefighters. These courses may not meet the minimum requirements and standards per Chapter 9.1.

Firefighter I & Firefighter II Certification Course

The Firefighter I and Firefighter II certifications are the minimum certifications required to staff any fire apparatus and actively participate at incident scenes for PWC. When a call is received and a fire apparatus is en-route to an incident, the expectation is that all individuals have consistent knowledge and understanding of the processes and procedures required to fulfill the tasks for those certifications. These two certifications are the foundation that all additional training, certifications and promotions to higher rank are built upon and are the building blocks to advance on equipment that is more complex. Therefore, it is critically important that system-wide, there is consistency in this training. This, in turn, provides greater value and return on the training investment to the firefighters of PWC's Fire and Rescue System.

In May 2016, Buckhall Volunteer Fire Department and Cherrydale, a VFD in Arlington County, funded the certification course, and training was performed by the BVFD Fire Chief. This certification course was considered "unfunded" by PWC, rather than a delegated authority class. As such, the VDFP was responsible for making payment to the instructor(s). The certification course was not only for the benefit of fire and rescue members within the County, but additional VFDs outside PWC. All training held outside of the PSTC are required to include all VDFP and Chapter 9.1 curriculum requirements and standards.

All "unfunded" courses, are required to provide all applicable course documentation to the VDFP upon completion for maintenance, unlike a delegated authority class, where all records pertaining to students would be housed at the PSTC. It is also the responsibility of the VDFP to issue the FF I & II VDFP Pro Board® certifications to the students upon completion of the course.



BACKGROUND – CONTINUED

Firefighter I & Firefighter II Certification Course – continued

The VDFP provides guidance and support to ensure that competent individuals are trained in proper techniques. The VDFP does prescribe to the Pro Board® for certain NFPA standards, including Standard 1001 for FF I & II certifications. The VDFP is an accredited organization of the Pro Board® for Firefighter I and Firefighter II training. Therefore, NFPA Standard 1001 is the base requirement for all FF I & II certification course in the Commonwealth of Virginia.

Per the Pro Board® approved administrative guidelines of the VDFP, the VDFP approved curriculum for FF I & II training in Virginia includes a minimum requirement of 217 training hours, including both classroom and practical training. Additionally, training may be provided utilizing one of the two approved books for certification; “IFSTA Essentials of Fire Fighting. 6th Edition” and “Jones and Bartlett Fundamentals of Fire Fighter Skills. 3rd Edition.”

Investigation of FF I & II Certification Course Held at BVFD by VDFP

In January 2017, the VDFP issued a report of alleged improprieties identified through their investigation of the FF I & II certification course provided by the BVFD Chief. Below are highlights of the allegations identified and outcomes:

- Allegation 1: The lead instructor staffed units while teaching the course.
 - Outcome: The lead instructor confirmed that he did staff units during class
- Allegation 2: The lead instructor staffed two course students on units during the class
 - Outcome: It was confirmed that the two students were staffed during class. The lead instructor claims that the time was made up when the students returned to the station.
- Allegation 3: Students shared answers to questions on a test on 5/19/16.
 - Outcome: Upon review of the schedule, it was determined that there was no test on this date and no proctor present.
- Allegation 4: Students were playing basketball and hockey during class hours.
 - Outcome: The allegation could not be proven, as the lead instructor and two paid staff members denied the allegation
- Allegation 5: A non-approved instructor taught the class.
 - Outcome: The lead instructor stated that he taught those classes, although records indicated that the non-approved instructor signed-off on those classes. This is unacceptable as it is the responsibility of the lead instructor to provide sign-off.

NOTE: Refer to **Appendix A** for the complete results of the VDFP’s investigation of the BVFD FF I & II certification training course.

Internal Audit of FF I & II Certification Course Held at BVFD

As the FF I & II certification course was an unfunded course, potentially including students from other jurisdictions, there were limitations in obtaining and reviewing documentation as part of this internal audit. In February 2017, we submitted a FOIA request and received the following responses to specific documentation requests from the VDFP Marketing and Communications Manager:

- *The Daily Attendance Sheets and Daily Standard Roll Call Forms are exempt under § 2.2-3705.4 (1): Students.*
- *Classroom Attendee Listings – This information is exempt under § 2.2-3705.4 (1): Students.*
- *Student Documentation – This information is exempt under § 2.2-3705.4 (1): Students.*
- *Trainer Documentation – This information is exempt under § 2.2-3705.1 (1): Personnel.*
- *Trainer Documentation – This information is exempt under § 2.2-3705.1 (1): Personnel.*
- *Pass/Fail Test Results – This information is exempt under § 2.2-3705.1 (4): Tests and examinations.*



BACKGROUND – CONTINUED

Additional Information

Uniform Rank Structure

FRA Policy – 4.5.1. Purpose: 1.1. “This policy establishes the minimum certification levels for fire and rescue personnel in Prince William County. 1.2. In any comprehensive fire and rescue system it is necessary to develop minimum certification levels for all participants to address issues of safety, accountability, legal considerations, and peer expectations. Because service delivery demands are equal upon volunteer and career members of the system and there is a need to have a centralized approach to training efforts, these minimum certification levels are necessary.”

FRA Policy and Procedure Section 4.1 *Uniform Rank Structure* (“URS”) references the minimum training and certification curriculum requirements for operational members of the fire department within PWC. The FRA has adopted specific criteria of the VDFP and Chapter 9.1 minimum hour requirements, which includes the FF I & II certification program.

Certification Requirements

The FRA curriculum includes all requirements in the Pro Board® approved VDFP administrative guidelines, and exceeds them by 145 hours, for both classroom and practical hours. Per PWC’s Training Chief, the FRA requirements exceed that of the VDFP in order to ensure “mastery” for skills versus an “introduction” for skills that the VDFP minimum requirements provides for.

Additionally, as part of the agreed FRA Policy 4.5.3 procedures for *Critical Performance Standards* for FF I Program, there are three critical performance standards required for all FF I certification programs. The following outline those additional requirements, applicable to the FF I training, which were issued by the FRA on January 21, 2009:

4.1 Standard 1

4.1.1 *The student, in full protective clothing and SCBA (does not breath cylinder air), will remove a 24- to 28-foot extension ladder from a fire department pumper and assist in raising it to a roof. The task of removing the ladder from the apparatus, placing it at the objective, extending the ladder, and preparing it for climbing shall be performed twice. The student shall perform each of the following:*

4.1.1.1 *Positioned at the heel of the ladder, the student shall assist in removing the ladder from the apparatus. The student shall place the ladder on the ground at the appropriate location and foot the ladder as it is raised. The student shall extend the fly section of the ladder at least five rungs or until the fly section is three rungs above the roof line. The student shall secure the halyard and ensure that the ladder is in the proper position for climbing.*

4.1.1.2 *Positioned at the tip of the ladder, the student shall assist in removing the ladder from the apparatus. The student shall raise the ladder after it is properly located by the student at the heel. After the ladder is extended and ready for climbing, the student shall don the SCBA face piece, breath cylinder air, ascend the ladder carrying an ax, and once on the roof, shall dismount the ladder and proceed at least fifteen feet from the ladder. The student will then return to the ladder, descend the ladder carrying the ax, assist in lowering the ladder, and place it back on the apparatus.*

4.2 Standard 2

4.2.1 *The student, in full protective clothing, SCBA (does not breathe cylinder air), and ladder belt, shall climb to the top of an aerial ladder set at the proper climbing angle of 70 degrees. The ladder shall be positioned to access the top of the training center burn building, or a building that is at least six stories high. The student shall dismount the ladder onto the roof of the target structure, walk at least fifteen feet onto the roof, and then remount the ladder and descend to the ground. The student shall complete the evolution in ten minutes or less.*

4.2.2 *The student will be allowed two attempts to complete the evolution.*



BACKGROUND – CONTINUED

Additional Information – continued

Certification Requirements - continued

4.3 Standard 3

4.3.1 *Fire Fighter I students are given tests throughout the course. These tests are designed to evaluate the students' comprehension and retention of the material which has been presented, as well as preparing them for the County certification test. These tests are composed of both multiple choice questions and practical exercises. Students are required to maintain at least a 70 percent average on the written tests.*

4.3.2 *If the student is unable to perform any of the standards listed above, he/she will be dropped (completely removed until the next Fire Fighter I class) from the class and re-evaluated by their training officer to determine their suitability as an active fire emergency service provider. The Training Section will work with the student's training officer to resolve any issues that arise due to these standards.*

Training / Certification Records Retention

Per FRA Policy 4.5.1 Section 5, with respect to records retention, certain responsibilities are outlined in the chart to the right. FRA Policy 4.5.9 Section 5.2.2 *Training Records and Internship Packets*, also addresses records retention and requires upon completion of a course the respective VFD Training Officer routes a certificate copy to the PSTC. However, only the certificate is required, not supporting documentation.

The PSTC relies on the individual volunteer companies for course information outside the delegated authority certifications. If training is taken at the PSTC, records will be maintained of the class/certification and if the VFDs send records to the PSTC for outsourced training, the records will be maintained at the PSTC.

Semi-annual reviews for compliance monitoring are to be performed per PWC's FRA URS policy, effective January 1, 2015. One (1) review has occurred since January 2015 (in October 2015); however, only officer certification was reviewed without review of rank and file members. Per Section 5.2 of the URS, the DFR is responsible to maintain training and certification information; however, DFR is wholly dependent on the individual VFDs to provide this information. Further, the Department Chief is responsible to ensure that training is documented and reported.





OBJECTIVE AND APPROACH

Objective

The objective of this internal audit was designed to assess whether the FF I & II course and certification provided outside of the PSTC in May 2016 was compliant with the County's Chapter 9.1. Services and scope of work focused on the following:

- Gaining an understanding of the curriculum of the FF I & II course provided outside of the PSTC;
- Comparing and contrasting curriculum conformity to training provided by the County's PSTC, including inspection of apparatus utilized as part of the training;
- Assessing compliance with Chapter 9.1;
- Determining compliance with testing standards for successful student completion of course curriculum;
- Assessing sufficiency of the records and documentation maintained; and
- Gaining an understanding of PWC's "delegated authority" designation from the Virginia Department of Fire Programs, with responsibility and accountability for retaining status, including curriculum standards, instructor certification and retention of status.

Approach

Our audit approach consisted of the following three (3) phases:

Understanding and Collecting Relevant Data and Information

The first phase of this internal audit consisted primarily of inquiry, in an effort to obtain an understanding of the key personnel, risks, processes, and controls relevant to the objective outlined above. The following procedures were completed as a part of this phase:

- In order to obtain an understanding of the process and identify related controls, we conducted interviews with the key personnel and representatives from the County's Department of Fire and Rescue to discuss the objective and scope of this internal audit, obtain preliminary data, and establish working arrangements;
- Made multiple attempts to interview members from BVFD;
- Interviewed representative from the Virginia Department of Fire Programs; and
- Obtained and reviewed of relevant documents related to course curriculum and certification.

Evaluation of the Design and Effectiveness of Process and Controls

The purpose of this phase was to conduct compliance testing of the course and certification records to meet our objective outlined above. Procedures were to include:

- Analysis and reconciliation of Virginia, PWC and BVFD training requirements;
- Review and assess class curriculums for compliance with Chapter 9.1; and
- Inspection of class files to determine compliance with requirements for successful completion of the course curriculum and certification.

Reporting

At the conclusion of this internal audit, we summarized our findings and observations into a written report. We have reviewed the results with the appropriate persons in Management, and have incorporated Management's response into this report.



OBSERVATION MATRIX

Observation	1. Compliance with Training Obtained Outside of the PSTC
High	<p>As of the date of this report, we were not provided documentation or information related to this compliance audit. As such, we were unable to determine the standards for which the students were tested and certified, or validate whether the training and certification provided complied with Chapter 9.1. However, we can acknowledge non-compliance of records retention per Chapter 9.1.</p> <p>Per Chapter 9.1-3(b)(4),</p> <p><i>“The DFR Chief is responsible to manage and administer . . . training of new recruits in core classes necessary to achieve basic certifications as firefighters and emergency medical technicians.”</i></p> <p>Per FRA Policy Section 4.5.9 <i>Training Records</i>,</p> <p>It is the responsibility of the Training Officer to <i>“Maintain an updated station copy of each of their personnel’s training records and Maintain routine communications with the TD Administrative Staff to ensure their members’ records are complete...”</i> Also it is the responsibility of the DFR Management Services Staff to <i>“Manage tracking process, database, and electronic filing of all training records and certifications.”</i></p> <p>While the DFR Chief retains the responsibility to ultimately ensure basic certifications are achieved per Chapter 9.1, Commonwealth of Virginia law has privacy requirements concerning training records and therefore the records are considered the property of the individual VFDs, not the FRA. In absence of the individual VFDs providing the records to the FRA Chairman (DFR Chief), it is nearly impossible to retrieve the documents despite provisions in Chapter 9.1 and FRA Policy 4.5.9 <i>Training Records</i> to provide the documents. Despite the fact that the DFR Chief is required to ensure training is documented and reported per FRA Policy 4.5.1 Section 5.4 <i>URS</i>, the DFR Chief is reliant upon others to provide access to information for which he is responsible.</p> <p>In scenarios where PWC is relying on outside entities or contractors to provide training and certification, it is important for the County to understand the curriculum and delivery results of these outside providers to maintain consistency throughout the County’s fire and rescue operations.</p> <p>Although volunteer companies are allowed to pay for and receive training outside of the PSTC, there is a risk that the training volunteer companies receive outside the PSTC are not compliant with the standards established by the FRA (Chapter 9.1 and FRA Policy - <i>URS</i>). This increases the risk to the integrity of the County’s fire and rescue services provided to the community.</p>



OBSERVATION MATRIX – CONTINUED

Observation	1. Compliance with Training Obtained Outside of the PSTC - continued
<p>Recommendation</p>	<p>Due to the potential limitations that can occur with volunteer companies receiving training outside of the PSTC, we recommend that requirements be put in place to supplement Chapter 9.1.-3(b)(4) as it relates to outside training. Suggested requirements are as follows:</p> <ul style="list-style-type: none"> • Pre-approval of the training must be obtained by the PSTC; • Pre-approval of the training must include authorization/certification by the responsible volunteer chief that all related training records (curriculum utilized, test results, roster – including instructor/test proctor/students, and attendance sheets) will be released to the PSTC, should the PSTC choose to execute the “right to audit” clause of the outside training received; • The PSTC may choose to have a representative present during the outside training session(s), and • The PSTC may execute a “right to audit” all outside training courses received.
<p>Management’s Action Plan</p>	<p>Response: Accept with details: The Virginia Department of Fire Programs (“VDFP”) has agreed to notify the Prince William County DFR of training requests received through their offices. These requests will require the approval of the DFR Training Battalion Chief before VDFP will process the request. This process has been in place for the past six months and has worked well to date.</p> <p>DFR will develop a skills verification process for system members who receive FF I & II certifications through an outside agency. Initially this verification will focus on existing VDFP skills station testing in addition to FRA Policy 4.5.3 which includes a 28-foot ladder throw and carry, aerial ladder climb, MSA SCBA module, and successfully traversing the PSTC maze.</p> <p>DFR will require all students attending an outside VDFP course to complete a VDFP Authorization and Release for Student Records. This will allow DFR to obtain and place all student files in the AgencyWeb Records Management System (“RMS”).</p> <p>Responsible Party: Training Battalion Chief</p> <p>Estimated Completion Date: January 1, 2018</p>



OBSERVATION MATRIX – CONTINUED

Observation	2. FRA Policy 4.5.1 Uniform Rank Structure Semi-Annual Certification Compliance Monitoring
<p style="text-align: center;">High</p>	<p>The FRA adopted Policy 4.5.1 <i>Uniform Rank Structure</i> that defines the required minimum certifications by position and rank for all fire/rescue companies in Prince William County through Resolution No. 13-73 dated October 16, 2013, with an implementation date of January 1, 2015. The FRA granted an extension to incumbent members through June 30, 2017, via Resolution No. 14-61 dated November 19, 2014. The policy (Section 4.10) also requires a semi-annual review for compliance, effective January 1, 2015. As of the date of this report, only one (1) review has occurred for officers only. The review was completed for the officer certification program and did not include the rank and file member certifications.</p> <p>Training and certification courses provide the tools and credentials required to allow fire and rescue personnel to deliver services throughout the County with a level of comfort to its citizens that there is a competency. The ongoing monitoring and periodic review for compliance is necessary to ensure that persons are appropriately certified to provide fire and rescue services within the County.</p>
<p>Recommendation</p>	<p>We recommend that a schedule/timeline of the semi-annual reviews for compliance monitoring be developed and adhered to, as required in the FRA Policy 4.5.1 <i>Uniform Rank Structure</i>. The plan should include the following:</p> <ul style="list-style-type: none"> • Frequency of the review (every 6 months); • Date of review; • FF I & II certification programs in scope for each review; and • Member coverage. <p>The results of each review should include an assessment of the following information:</p> <ul style="list-style-type: none"> • Program compliance with Chapter 9.1; • Completion of the pre-approved curriculum, including execution of all classes, guides, quizzes and tests (where applicable); • Document maintenance and retention, including sign-offs of required documentation; • Feedback/evaluations from students on the effectiveness of the instructor and training program; and • Recommendations for enhancing the certification program, if applicable.



OBSERVATION MATRIX – CONTINUED

Observation	2. FRA Policy 4.5.1 Uniform Rank Structure Semi-Annual Certification Compliance Monitoring – continued
Management's Action Plan	<p>Response: Accept with details: The DFR Chief is proposing a Fire and Rescue System Compliance Officer position within the Office of the Chief. This position will be created through a reclassification/upgrade of the FRA System Coordinator (ASA III) position. Once this new position is approved, an on-boarding process will be developed for system members, which will include obtaining all training record copies and certifications for incorporation into the AgencyWeb RMS. This position will also provide a report to the System Chief every six months in regards to URS compliance of all members of the PWC Fire and Rescue System.</p> <p>Responsible Party: System Chief</p> <p>Estimated Completion Date: July 1, 2018</p>



APPENDIX A – BUCKHALL FF I & II COURSE INVESTIGATION

Investigation of Alleged Improprieties with FF I & II Course at Buckhall VFD #2

January 6, 2017

This will be the second of two investigations on the FF I & II classes at the Buckhall Volunteer Fire Department. This second investigation involves the lead instructor staffing units, students staffing units, sharing answers to questions at a table, playing sports during classes, and an allegation of a non-approved instructor teaching several of the classes.

Information was received from the Prince William Fire Department that the lead instructor (Luke Nuar), staffed units while teaching the FF I & II courses at Buckhall. CAD reports show that Luke Nuar did sign-in to staff a unit during the instruction of these classes. Paid staff at Buckhall also stated that Nuar staffed a unit several times while delivering the courses at Buckhall. Nuar's response to the question "Did you staff units while instructing at Buckhall?" was "Yes, the citizens of Prince William County needed to be protected and served. This was unacceptable to Fire Programs as we do not encourage any instructors to staff any units while delivering courses.

There were two students in these classes who also staffed units while in the class. Ben Jacobeen and Rodney Fielding were the two students who on several occasions, staffed an ambulance and were dispatched on calls. When the students ran these calls, the lead instructor (Nuar) claims that the time was made-up when they returned to the station. Paid staff also stated that they saw students dispatched on calls while in the class sessions. This is also unacceptable and the lead instructor is responsible for this.

The allegation of students sharing answers to questions at a table was stated by paid staff at Buckhall. It was stated that on 5/19/16, this occurred. Upon looking at the schedule, it was determined that this was not a test date. No proctor was present also as there was no test to be given on this date.

Paid staff stated that during the classes, there were students playing basketball and hockey. When asked of this to Nuar he replied "This is not true." Two paid staff members (Newell and Hauser) stated that this did happen. Without further information or proof, this allegation cannot be proven.

The allegation of a non-approved instructor teaching class was also stated by Prince William paid staff. Our records indicate that the lead instructor on several dates was Chris Kendrick. Chris Kendrick is not an approved FF I & II instructor with VDFP. When I asked Nuar this, he stated "I was the lead on those nights." After asking him several times as we had records of Kendrick signing off on those classes as the lead instructor, Nuar continued to state that he was the lead instructor. This is also unacceptable as the lead instructor is supposed to sign-off and place their name in the area for the lead instructor.

With this new information on the Buckhall FF I & II courses, the paid staff of PWC statements, meeting with Senior Leadership of PWC, and interviews with several paid members and Luke Nuar, a decision has been made on Luke Nuar's status with VDFP based on new information received from several sources.

I have advised Luke Nuar that he is not to instruct any certification classes in Prince William County and Fairfax County indefinitely. Nuar is not allowed to instruct, proctor, or assist in any way. He is also placed on a probationary status for one year starting January 6, 2017. Any further improprieties during this timeframe will result in further disciplinary measures.

Dereck Baker

Division 7 Chief

Virginia Department of Fire Programs



APPENDIX B – CLASS NOTIFICATION CORRESPONDENCE



APPENDIX B – CLASS NOTIFICATION CORRESPONDENCE - CONTINUED



COUNTY OF PRINCE WILLIAM

1 County Complex Court, Prince William, Virginia 22192-9201
(703) 792-6800 Metro (703) 631-1703 FAX (703) 792-7691

FIRE AND RESCUE ASSOCIATION

Chief Steven Chasin	Deputy Chief Timothy Keen	Chief Michael Silva
Chief Anthony Cooch	Chief James McAllister	President William Spicer
Chief Walter Davis	Assistant Chief Lance McClintock	Technician II Estee Warring
Chief Jerry Deem	Chief Luke Nuar	President Melissa Wright
Assistant Chief James Forgo	President Richard Rubino	Chief Miles Young

Chief Kevin J. McGee
Chair

Chief Christopher Hool
Vice Chair

February 16, 2017

TO: FRA Board of Directors
FROM: Chief Kevin J. McGee, Chair
Fire and Rescue Association

SUBJECT: Virginia Department of Fire Programs Delegated Authority Routing

On January 23rd, 2017 the Prince William County Department of Fire and Rescue (PWCDFR) received direction from Virginia Department of Fire Programs (VDFFP) regarding course request and delegated authority status. This correspondence is attached for reference. Currently PWC has delegated authority for the following courses;

- Firefighter I/II
- Hazardous Material Awareness/Operations
- Driver Pump Operator
- Driver Aerial Operator
- Officer I/II
- Instructor I/II

In an effort to coordinate course delivery and ensure that PWC specific curriculum is being followed, VDFFP will route all future request for delegated authority courses to the PWC Public Safety Training Center (PSTC). These request will be coordinated with the PWC Fire and Rescue Association (FRA) Course Catalog and if found to fill an unmet capacity need advertised to all FRA departments. All instructor and course material will also be routed to the PSTC for final course review and archival on behalf of VDFFP.

Should you need further information on this matter please do not hesitate to contact Battalion Chief Chris Granger at 703-792-7490.



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