

6 Health and Safety Standards

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6.1 Responsibilities

The following positions are responsible for administering the health and physical fitness standards for the Structural Fire Program:

6.1.1 Superintendent/Park Level

- Ensure all members performing structural firefighting duties are medically qualified.
- Provide review and, if warranted, approve risk mitigations for employees.
- Ensure that current and accurate information regarding structural fire physical fitness requirements is communicated to all trained and qualified employees involved with structural firefighting.
- Ensure that all park personnel that are assigned structural firefighting responsibilities comply with policies and directives regarding physical fitness standards and that they are met.
- Prohibit engine company members who do not meet the medical and physical fitness requirements from participating in structural fire activities, until compliance can be obtained.
- Ensure that issues regarding firefighter physical fitness standards are communicated to park management, the RSFM, and the Structural Fire Operations Program Manager (SF-OPM) in a timely manner.

6.1.2 Regional Level

- Provide oversight for their parks ensuring compliance with this policy.
- The RSFM may serve as a member of an appeals team, if required.
- Ensure that information regarding structure fire physical fitness issues is clearly communicated to parks and the NPS Structural Fire Program Office.

- Monitor and ensure that parks are adhering to policies and procedures regarding structural firefighter physical fitness standards.
- Provide clear agency and program policy guidance to parks on NPS structural firefighter physical fitness standards.

6.1.3 National Level

- Oversee and manage the agency's structural fire medical and physical fitness standards.
- The NPS Structural Fire Program is the primary point of contact between the park and the DOI Medical Standards Program.
- Establish and maintain a structural firefighter fitness standard program.
- Ensure fitness requirements are compliant with federal laws and department and agency requirements and applied equitably and with utmost confidentiality.
- Inform RSFMs about the requirement to assess structural firefighter physical fitness levels for them to be able to better enforce these standards.
- Maintain and monitor physical fitness compliance for structural firefighters.
- Coordinate structural firefighter fitness processes and standards with other NPS programs as needed.

6.2 Medical Standards

All firefighters and individuals participating in structural fire suppression training and operations must:

- Adhere to the NPS structural firefighter medical standards.
- Report for medical examinations as directed.
- Notify their park structural fire program manager (PSFPM) of any significant health changes that may affect their ability to safely perform the essential duties of an NPS structural firefighter.

All employees assigned with structural firefighting duties in the NPS shall follow NFPA 1582: *Standard on Comprehensive Occupational Medical Program for Fire Departments*. Application of the standard is the responsibility of all employees. This includes legal considerations protections for individuals who are members of protected classes. These protections can be found in the NFPA 1582 Annex B. This includes respect to The Pregnancy and Reproduction Act. Employees and supervisors should reference NPS and DOI human resource policies for specific guidance. NPS employees who respond to structural fire incidents as a member of a local fire department and are paid by the NPS (salary and/or benefit status) shall comply with the standards outlined in this policy.

Concession contract employees with structural firefighting duties, shall adhere to their employer's medical standards program.

6.2.1 Medical Standards by Primary Occupations

Regardless of their primary duties, all employees shall select structural fire determination on their medical exam request to participate in structural firefighting. Employees will use

the process defined by the DOI Medical Standards Program to request their examination and submit their Health Screening Questionnaire (HSQ). NPS employees performing structural firefighting can be categorized by their primary occupations.

6.2.1.1 Law Enforcement Officer (LEO)

A LEO determination of ‘qualified’ for an employee’s primary duty, along with the structural fire determination, serves as being medically qualified as a structural firefighter. A determination of ‘not qualified’ will trigger the risk mitigation waiver process used for LEOs.

If the employee is granted a medical waiver or variance, or if special mitigations have been established to help the employee meet the medical standards for their position, those waivers, variances, or mitigations must be submitted to the DOI Medical Standards Office for review by the Medical Review Officer (MRO). The MRO will review the special accommodations and determine if they have an adverse impact on the employee’s ability to perform structural firefighter duties.

6.2.1.2 Wildland Firefighter (WFF)

A WFF determination of ‘qualified’ for an employee’s primary duty, along with the structural fire determination, serves as being medically qualified as a structural firefighter. A determination of ‘not qualified’ will trigger the risk mitigation waiver process used for WFF.

6.2.1.3 Structural Firefighter (SFF)

An employee with primary duties as a structural firefighter shall request a structural fire determination through the park’s medical exam point of contact or the NPS Structural Fire Program prior to participating in any structural fire activities. A structural fire determination of ‘qualified’ shall be required to perform structural firefighting duties. A structural fire determination of ‘not qualified’ will trigger the risk mitigation waiver process used for structural firefighters.

6.2.1.4 Other

Employees in positions not requiring participation in the medical standards program and performing structural fire duties shall request a medical with a structural fire determination through the NPS Structural Fire Program. A structural fire determination of ‘qualified’ shall be required to perform structural firefighting duties. A structural fire determination of ‘not qualified’ will trigger the risk mitigation waiver process used for structural firefighters.

6.3 Periodic Medical Exam and Self-Certification

All employees participating in the DOI Medical Standards Program will submit to a physical examination once every three years. In the years in between examinations, all employees are required to submit an HSQ.

- HSQs for LEOs are not altered for structural firefighting activities.
- HSQs for all other programs will include a respiratory HSQ.

6.3.1 Cost of Medical Examinations

- NPS employees whose primary duty is a WFF or LEO will have their examinations paid through their primary duty program. All other NPS structural firefighter examination costs will be funded by the NPS Structural Fire Program.
- Exam costs for concessioners or other non-NPS employees are the responsibility of the park, the individual, or the individual's employer. For all other NPS firefighters, such as administratively determined (AD) employees, contact the Structural Fire Program for guidance.
- The costs associated with any waivers, variances, mitigations, corrective actions, or follow-up treatments identified or determined necessary as a result of the medical exams or the HSQ is the responsibility of the individual or the park.

6.4 Risk Mitigation Waiver Process

Structural firefighters who are in the risk mitigation waiver process are prohibited from performing structural firefighting duties and training until a formal decision has been determined by the MRO.

The NPS Structural Fire Program Risk Mitigation Waiver Process has been established to provide the employee with the opportunity to request a secondary review if the employee does not agree with the findings of the medical determination.

To initiate the risk mitigation waiver process, the employee is responsible for contacting the DOI Medical Standards Program. The NPS Structural Fire Program may provide guidance to the employee on the risk mitigation waiver process.

6.4.1 Risk Mitigation Waiver Review

A review will be conducted by the:

- Park Structural Fire Program Manager (an individual in charge of the park structural fire operations program, such as the fire chief, fire management officer (FMO), chief ranger, or designated employee)
- Servicing Human Resources Office (SHRO) representative
- Employee

6.4.2 Risk Mitigation Assessment Factors

During the risk assessment, the following factors will be reviewed:

- Medical Condition and Ability to Safely and Efficiently Perform the Tasks Required of a Structural Firefighter
 - Given the medical condition or physical limitation which does not meet medical standards, describe with convincing evidence how the individual can perform the essential functions of the job efficiently and safely, without hazard to themselves or others.
- Qualifications, Experience, and Training
 - Describe the individual's relevant employment history, qualifications, experience, and training in structural firefighting. Include all satisfactory performance indicators in the same/similar type of job tasks with similar physical and environmental demands.
- Significant Threshold Shifts
 - If known, describe any changes in the individual's health status, since any medical conditions/physical impairments were last assessed.
- Medical Condition is Static and Stable
 - If known, describe whether the medical condition is static and stable or has stabilized with or without medication. Include any known:
 - drug side effects
 - drug reactions
 - drug interactions
 - medical complications associated with long term drug use and/or any problems with patient compliance.
- Work Conditions
 - Describe whether the work conditions (e.g., working alone; 24-hour on call; remote, desolate geographic and rural locations; no ready access to food, water, shelter, or medical facilities; irregular, protracted, and extended hours of work; exposure to extreme heat and environmental contaminants; inhalation exposures to smoke and the products of combustion; carrying heavy equipment and life-threatening situations that require maximum physical exertion without warning) are –
 - Likely to aggravate, accelerate, exacerbate, or permanently worsen the pre-existing medical condition and/or
 - Exceed the limitations of any medical or assistive device (e.g., insulin pump).
- Body Stature and Personal Protective Equipment

- Describe whether an individual's stature or body symmetry exceeds the limitations of any personal protective equipment (e.g., turnouts, SCBA, helmet, boots, handlines and nozzles) that they are required to use or wear.
- Physical Limitations
 - Describe whether any physical defect, physical limitation, or physical abnormality materially interferes with the individual's ability to perform the full range of structural firefighting tasks safely and efficiently.

6.4.3 Risk Mitigation Waiver Submission

Following the review of the risk mitigation assessment factors, the findings and recommendations will be forwarded in a formatted memorandum to a park level line officer (superintendent or approved designee) for final approval at the park level with the following recommendations:

- Waiver – the medical condition/physical impairment presents an acceptable risk without conditions or mitigation.
- Acceptable Risk with Conditions – the medical condition/physical impairment presents an acceptable risk when specific conditions are established to mitigate the risk.
- Unacceptable Risk – the medical condition/physical impairment presents an unacceptable risk and is therefore disqualifying.

The Risk Mitigation Waiver memorandum shall then be submitted to the DOI Medical Standards Program Office for review by the MRO. The MRO will accept/deny the final determination based on the assessment factors and the essential functions of the structural firefighter position.

6.4.4 Risk Mitigation Waiver Appeals

Employees in disagreement with the risk mitigation waiver review and/or MRO's final decision in the risk mitigation waiver process may appeal through their SHRO.

6.5 Fitness Standards

The NPS has recognized the need for a physical fitness standard and requirement for structural firefighters, so firefighters can safely and efficiently perform the rigorous duties associated with this profession. Individuals conducting structural firefighting duties within the NPS shall follow Director's Order 57 and Reference Manual 57: *Occupational Medical Standards, Health, and Fitness*.

All employees who perform rigorous and/or hazardous duties are required to participate in the NPS physical fitness program and any associated fitness testing programs. Mandatory participation positions identified in DO/RM-57 include structural firefighters.

CFR 339.203 authorizes agencies to establish physical requirements for positions with physically rigorous duties. The NPS has established the following criteria for its mandatory participation fitness program and fitness testing for all emergency service personnel:

- The continual maintenance of the physical fitness level required to safely perform rigorous duties is a responsibility of the individual employee.
- All employees who are assigned rigorous duties are required to participate in an individual fitness program.
- Prior to beginning a physical fitness program and prior to any physical fitness testing, employees must be cleared to participate by the MRO via the medical examination program.

All parks employing park rangers or other employees assigned to firefighting duties may provide each employee up to three hours of mandatory participation physical fitness exercise time per workweek.

An applicant who does not meet the OPM or departmental medical standards established for such work may not be appointed to a position designated for enhanced firefighter retirement. This applies to career, career-conditional, term, and temporary appointments.

Employees may not be admitted to firefighting training as a student or an instructor that requires the regular or frequent performance of rigorous duties, unless they meet the physical fitness standards established for persons performing such duties.

6.5.1 Fitness Standards Requirements

The Structural Firefighter Physical Ability Test (PAT) is the baseline fitness assessment for the NPS Structural Fire Program. As such, the NPS will not place persons failing to pass either the PAT in firefighter positions or training that requires the regular performance of arduous duties.

6.5.2 Fitness Standards for Fireground Positions

Employees actively engaged in structural firefighting must annually pass the PAT. These positions include:

- Firefighter I
- Firefighter II
- Fire Officers
- Live Fire Instructors

6.5.2.1 Structural Firefighter Physical Ability Test (PAT)

The PAT consists of structural firefighter related tasks over a multiple station timed course. The PAT is a validated assessment test to test firefighters' ability to meet the physical demands of the structural firefighter. The PAT is a PASS / FAIL assessment.

6.5.3 Fitness Standards (Non-Compliant)

Firefighter fitness is essential as structural firefighting is one of the most physically demanding and dangerous occupations. Not only is the employee's safety at risk, but also the safety of fellow firefighters.

- If the fitness examination is for an employee seeking their initial appointment (or

baseline) to a structural firefighter position and that employee fails the PAT, they are not permitted to begin serving as a firefighter, until they pass the PAT.

- If the employee taking the PAT fails, they are granted a two-month grace period to retake the exam. During the grace period, the employee may continue to perform as a firefighter. If at the end of the grace period, the employee still cannot pass the PAT they are no longer permitted to serve as a firefighter.
- Personnel who have failed to comply with the physical fitness standards, but still have certifications for any of the designated fireground positions, can again perform in those positions once they have successfully met the physical fitness standards. Employees working toward complying with the standard, but have not yet met the standard, may request to have their certifications placed into Inactive Status. Employees can continue to work toward meeting their continuing education and live fire training requirement, but only if they are medically qualified.

6.6 Record Management

The NPS Structural Fire Program Office has created a servicewide compliance tracking system to maintain medical and fitness records; parks are required to use this system for firefighter compliance, medical and fitness records management. Individuals are ultimately responsible for maintaining their certifications and compliance to include data uploaded to the tracking system.

6.7 Mental Health and Awareness

The mental health and awareness for first responders presents a unique set of stressors encountered on the job and creates challenges for them and their families. To address this reality, first responders can learn how to take care of their mental health and the awareness of resources available to their needs. If approaching a supervisor, manager or peer is not feasible or effective, there are other options for assistance, counseling, and support.

Firefighter mental health and suicide prevention awareness shall be incorporated into NPS Structural Fire Program training and certification courses. Park structural fire programs shall incorporate and schedule annual training to educate firefighters in the signs and symptoms of behavioral and emotional distress, and aspects of the agency and industry member assistance programs available.

6.7.1 Employee Assistance Program (NPS)

The Employee Assistance Program (EAP) is available 24 hours a day / 7 days a week to all NPS employees. This program is free, provides confidential counseling and support on mental health, financial, professional, and personal management assistance and many other services to include video-enabled counseling. The service is strictly confidential.

- 24/7 Hotline for counseling and support: **1-800-869-0276**
- Department of the Interior Employee Assistance Program: [Employee Assistance Program | U.S. Department of the Interior \(doi.gov\)](#)

6.7.2 Federal Emergency Management Agency (FEMA)

- FEMA/US Fire Administration Mental Health Awareness for First Responders: [Mental Health Awareness for First Responders \(fema.gov\)](#)

6.7.3 Other Resource Agencies

- International Association of Firefighters: [Supporting Fire Fighter Mental Health - IAFF](#)
- Mental Health America: [Mental Health America | Homepage | Mental Health America \(mhanational.org\)](#)
- Fallen Firefighters Foundation: [Stress First Aid \(SFA\) - Everyone Goes Home](#)
- Firefighter Behavioral Alliance: [Firefighter Behavioral Health Alliance \(ffbha.org\)](#)
- Suicide Prevention Lifeline: (24/7) **1-800-273-8255**

If you or someone else is at immediate risk of harming yourself or another person, CALL 911.