



The Corporation of the Town of LaSalle

Date	February 23, 2018	Report No:	FIRE 18-07
Directed To:	Mayor & Members of Council	Attachments:	Draft Regulation
Department:	LaSalle Fire Service	Policy References:	
Prepared By:	Dave Sutton, Fire Chief		
Subject:	Public Consultation on Proposed Regulation - Mandatory Public Reporting		

RECOMMENDATION:

It is recommended that Council receive the report of the Fire Chief regarding the proposed draft regulations affecting the delivery of municipal fire services, and further that Council support the recommended comments to the Ministry of Community Safety and Correctional Services (MCSCS) through the public consultation process, prior to the close of public comment on March 18, 2018.

REPORT:

On February 16, the Ministry of Community Safety and Correctional Services (MCSCS) released an additional proposed regulation under the *Fire Protection and Prevention Act, 1997* (FPPA), related to new requirements for Mandatory Public Reporting on fire department response data for all fire departments in the province.

The MCSCS is seeking public feedback on the proposed regulation during an open comment period for public consultation which closes March 18, 2018. The draft regulation is attached for review and information purposes.

Essentially, the intent of the regulation is to require, as of January 2020, detailed regular reporting to municipal Council, the Fire Marshal, and, the public, of response times to all incidents and calls for service that a municipal fire department responds to. The reporting must also be compared to performance against the recognized applicable NFPA standard for either career or volunteer fire departments, and further must indicate the fire department's response time performance for 90% of the various calls it responds to. The various components of the total response times must also be calculated and reported where available, such as call transfer time, alarm processing time, alarm handling time, turnout time, intervention time, etc.

The regulation as drafted raises a number of concerns that at this point have not been addressed. The regulation does not recognize the response models of composite fire services serving communities ranging from urban to rural areas, such as the service delivery model in LaSalle. Compliance with the current draft would require LaSalle Fire Service to provide

reporting based on the table and standard for “non-volunteer firefighters” as the first arriving emergency response unit is normally staffed with only full-time personnel, however in many cases that staffing is currently the single driver/operator by themselves. The standard applied in this case in the regulation is the NFPA 1710 Standard for Career Fire Departments, typically applied in larger urban municipalities with all full-time staffing on all responding apparatus. The NFPA 1720 Standard for Volunteer Fire Departments provides for variations in response criteria according to population density defined as urban, suburban and rural. The current draft of the proposed regulation does not include reference to areas of differing population density in the standard for volunteer department reporting, and precludes reporting to that standard if the first responding emergency response unit is staffed by full-time personnel. Further consideration needs to be given to the various composite response models in order to provide accurate and meaningful reporting that reflects the effectiveness of the service delivery model chosen by the municipality to meet their needs and circumstances.

The regulation in its current form would appear to require reporting and comparison to the standard for emergency calls, to be reported for all incident responses. Typically in most fire services, there a number of calls for service that do not require an emergency response and are assigned a lower priority to maximize safety and cost effectiveness of service delivery. There are also cases where a call that originates as an emergency response is downgraded prior the arrival of emergency response units due to additional information received. Inclusion of response statistics for these anomalies would skew the public reporting requirements, and provide inaccurate comparisons of performance against the standard for emergency response.

Another significant consideration is the fact that the requirements for compliance with the proposed standard affect both municipal fire departments, and the agencies providing call taking and dispatch services. There are many variations of dispatch services across the province with a wide variation of methods and application of relevant technologies to capture and transmit the required components of the overall response times as required by the standard. In some cases, technology and procedures currently in use may not be capable of capturing required elements for compliance, and in other cases significant additional administrative staff time be required to manually process the data to accurately comply with the regulation. (ie differentiating travel times and turn-out times for fire suppression calls vs. medical calls, or alarm processing times for typical fire calls vs. “calls that require determining the location of the alarm due to insufficient information”). Standardization of call taking and dispatch technology and procedures must be considered if there is a desire to provide accurate and standardized reporting of emergency response data among various municipalities, in comparison with recognized standards.

It is expected that these challenges will affect many municipal fire services. The recommended comments on the draft regulation included in this report are intended to attempt to affect amendments that will alleviate the effects of the noted challenges.

LaSalle Fire administration, as well as LaSalle Police administration are currently reviewing the draft Regulation in detail, to determine the operational and financial impact on the LaSalle Fire Service as well as dispatch services for the various fire service clients. Subsequent reporting through Fire Committee will provide Council with an update on impacts and financial implications once the proposed Regulation is finalized and becomes a legislated requirement.

Recommended Comments

The municipality of Town of LaSalle, and the LaSalle Fire Service recommends that the proposed regulation not proceed in its present draft form until a comprehensive evaluation and review and overhaul of the Standard Incident Reporting system (SIR) is undertaken, and also until the reporting requirements for composite fire departments are better clarified. Significant operational and response differences exist between full-time career staffed services, and primarily volunteer services that have a composite component, with initial apparatus responding with minimal full-time staff. The current draft of the proposed regulation does not capture these differences. In its current form, accurate and consistent reporting among municipal fire services is not possible.

In addition to the recommendation that the implementation of the regulation be delayed, the following comments are recommended to be submitted to the Ministry of Community Safety and Correctional Services (MCSCS) as part of the public consultation process:

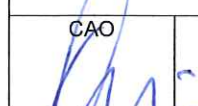
- a) It is recommended that the reporting requirements be amended to recognize the various response models of the many composite fire services in the province. In many cases an initial minimally staffed emergency response unit may be deployed, relying on volunteer firefighter support in suburban or rural areas. The community population density classifications of the NFPA 1720 Standard for Volunteer Fire Departments provide a better reflection of the service levels chosen by municipal Councils to meet their needs and circumstances in the many communities served by composite fire departments.
- b) It is recommended that a comprehensive review and revision of the Standard Incident Report (SIR) codes and categories be undertaken, in consultation with the fire service stakeholders, to better define response types, eliminate duplication and ambiguity in code categories. Further a subset of non-emergency response codes should be identified, to be excluded from the requirements for mandatory public reporting of performance against the standard for emergency response.
- c) It is recommended that the Ministry of Community Safety and Correctional Services provide direction, and the corresponding required funding, for the development and implementation of standardized technology and data processing procedures for all fire departments and dispatch services to provide consistency in data collection and reporting of the required elements of total response times required by the regulation, such that accurate performance comparisons can be made among municipalities.

Respectfully,



Dave Sutton

Fire Chief / C.E.M.C

Reviewed by:							
CAO	Treasury	Clerks	Public Works	Planning	Culture & Rec	Building	Fire
							

Caution:

This consultation draft is intended to facilitate dialogue concerning its contents. Should the decision be made to proceed with the proposal, the comments received during consultation will be considered during the final preparation of the regulation. The content, structure, form and wording of the consultation draft are subject to change as a result of the consultation process and as a result of review, editing and correction by the Office of Legislative Counsel.

CONSULTATION DRAFT

ONTARIO REGULATION

to be made under the

FIRE PROTECTION AND PREVENTION ACT, 1997

PUBLIC REPORTS

Definitions

1. In this Regulation,

“communication centre” means the building or portion of a building that is specifically configured for the primary purpose of providing emergency communications services or public safety answering point services to one or more public safety agencies under the authority or authorities having jurisdiction; (“centre de communications”)

“PSAP” is short for public safety answering point; (“CTSP”)

“public safety answering point” means a facility at which emergency calls are answered.
 (“centre téléphonique de sécurité publique”)

Preparation of public reports

Fire Marshal sends fire department the information

2. (1) The Fire Marshal must give every fire department the information required by Schedule 1, based on the information the Fire Marshal has received through incident reports.

Fire department prepares the public report

(2) Every fire department must prepare a public report setting out,

- (a) the information required by Schedule 1; and
- (b) any other information the fire department chooses to include.

Fire department may use Fire Marshal's data

(3) The fire department may use the information required by Schedule 1 that the Fire Marshal provided to prepare their public report, or may carry out their own calculations respecting the same time period.

Dissemination of public reports

From fire department to Fire Marshal

3. (1) Every fire department must give their public report to the Fire Marshal no later than 180 days after the Fire Marshal gives the fire department the information.

From fire department to municipality

(2) Every fire department that is authorized to provide fire protection services by a municipality must give their public report to the municipal council before giving its public report to the Fire Marshal.

From fire department to group of municipalities

(3) Every fire department that is authorized to provide fire protection services by a group of municipalities must give their public report to the municipal council of each municipality in the group of municipalities before giving their public report to the Fire Marshal.

Fire Marshal makes public

(4) The Fire Marshal may make the public report available to the public.

Commencement

4. This Regulation comes into force on the later of January 1, 2020 and the day it is filed.

SCHEDULE 1 REQUIRED INFORMATION

Required information, non-volunteer firefighters

1. (1) The public report must set out the following information respecting incidents in which the first emergency response unit that arrives on the scene does not include a volunteer firefighter:

1. For each standard set out in the Table to this section,
 - i. the percentage value of how often the fire department achieves that standard for the corresponding time interval, and
 - ii. the corresponding benchmark percentage value for how often the fire department should achieve that standard.
2. For each time interval set out in the Table to this section that does not have a corresponding standard, the time interval value that the fire department achieves or exceeds 90% of the time.

Exception, information not available

(2) The public report does not have to set out information for items 1, 2, 3, 4 and 8 if the information is not available from the fire department's records.

TABLE

Item	Column 1 Time interval	Column 2 Standard	Column 3 Benchmark
1.	Alarm transfer time: The time interval from the receipt of the emergency alarm at the PSAP until the alarm is first received at the communication centre	30 seconds	95%
2.	Alarm answering time: The time interval that begins when the alarm is received at the communication centre and ends when the alarm is acknowledged at the communication centre	15 seconds	95%
3.	Alarm processing time: The time interval from when the alarm is acknowledged at the communication centre until response information begins to be transmitted via voice or electronic means to emergency response facilities and emergency response units	64 seconds for calls other than the following calls; and 90 seconds for the following calls: 1. Calls requiring emergency medical dispatch questioning and pre-arrival medical instructions	90%

		2. Calls requiring language translation 3. Calls requiring the use of a TTY/TDD device or audio/video relay services 4. Calls of criminal activity that require information vital to emergency responder safety prior to dispatching units 5. Hazardous material incidents 6. Technical rescue 7. Calls that require determining the location of the alarm due to insufficient information 8. Calls received by text message	
4.	Alarm handling time: The time interval from the receipt of the alarm at the primary PSAP until the beginning of the transmittal of the response information via voice or electronic means to emergency response facilities or the emergency response units in the field	No standard; set out the time interval value that the fire department achieves or exceeds 90% of the time	No benchmark
5.	Turnout time: The time interval that begins when the emergency response facilities and emergency response units notification process begins by either an audible alarm or visual annunciation or both and ends at the beginning point of travel time	80 seconds for fire and special operations; 60 seconds for emergency medical services	90%
6.	Travel time: The time interval that begins when a unit is en route to the emergency incident and ends when the unit arrives at the scene	240 seconds for fire suppression; the following standards for the following emergency medical services: 1. 240 seconds for the arrival of a unit with a first responder with an automatic external defibrillator or higher level capability 2. 480 seconds for the arrival of an advanced life support unit, if a first responder with an automatic external defibrillator or basic life support had a travel time of no later than 240 seconds no standard for other services	90%
7.	Initiating action/intervention time: The time interval from when a unit arrives on the scene to the initiation of emergency mitigation	No standard; set out the time interval value that the fire department achieves or exceeds 90% of the time	No benchmark
8.	Total response time: The time interval from the receipt of the alarm at the primary PSAP to when the first emergency response unit is initiating action or intervening to control the incident	No standard; set out the time interval value that the fire department achieves or exceeds 90% of the time	No benchmark

Required information, volunteer firefighters

2. (1) The public report must set out the following information respecting incidents in which the first emergency response unit that arrives on the scene includes at least one volunteer firefighter:

1. For each time interval set out in the Table to this section, the time interval value that the fire department achieves or exceeds 90% of the time.

Exception, information not available

(2) The public report does not have to set out information for items 1, 2, 3, 4 and 8 if the information is not available from the fire department's records.

TABLE

Item	Column 1 Time interval
1.	Alarm transfer time: The time interval from the receipt of the emergency alarm at the PSAP until the alarm is first received at the communication centre
2.	Alarm answering time: The time interval that begins when the alarm is received at the communication centre and ends when the alarm is acknowledged at the communication centre
3.	Alarm processing time: The time interval from when the alarm is acknowledged at the communication centre until response information begins to be transmitted via voice or electronic means to emergency response facilities and emergency response units
4.	Alarm handling time: The time interval from the receipt of the alarm at the primary PSAP until the beginning of the transmittal of the response information via voice or electronic means to emergency response facilities or the emergency response units in the field
5.	Turnout time: The time interval that begins when the emergency response facilities and emergency response units notification process begins by either an audible alarm or visual annunciation or both and ends at the beginning point of travel time
6.	Travel time: The time interval that begins when a unit is en route to the emergency incident and ends when the unit arrives at the scene
7.	Initiating action/intervention time: The time interval from when a unit arrives on the scene to the initiation of emergency mitigation
8.	Total response time: The time interval from the receipt of the alarm at the primary PSAP to when the first emergency response unit is initiating action or intervening to control the incident