

COMMISSION ON STATE MANDATES

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December 6, 1996

Mr. Glen Everroad
Revenue Manager
City of Newport Beach
3300 Newport Boulevard
Newport Beach, California 92663

Mr. James M. Apps
Department of Finance
915 L Street, 8th Floor
Sacramento, California 95814

And Other Interested Parties (see attached list)

RE: Test Claim: CSM-4419 - New CFIRS Manual

The draft staff analysis of the test claim entitled CSM-4419 - New CFIRS Manual has been completed and is enclosed for your review and comment. The hearing on the test claim is set for February 27, 1997, 10:00 AM, at the State Capitol in Sacramento (room to be announced).

Written Comments

Any party or interested person may file written comments on the draft staff analysis until January 1, 1997. You are advised that the Commission's regulations require comments filed with the Commission to be simultaneously served on other interested parties (on the mailing list), and to be accompanied by a proof of service on those parties.

Written comments received by January 1, will be reviewed by staff and may be incorporated into the final staff analysis. A copy of the final staff analysis will be sent to you before the hearing on February 27.

Prehearing Conference

A pre-hearing conference has not been scheduled on this test claim. However, if you believe that one should be scheduled, please mail or fax your request to the Commission and the interested parties mailing list. A proof of service must accompany your request.

FILE COPY

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Disputed Test Claim

On August 29, 1996, the Commission found this test claim to be disputed for purposes of the began operating under the provisions of Chapter 945, Statutes of 1995 (SB 11). Once a test claim is deemed *disputed* by the Commission, the Commission will have 18 months from July 1, 1996, to adopt a statewide cost estimate, exclusive of extensions or postponements of time by the claimant, or delays caused by the claimant's submission of incomplete information. (Gov. Code, § 17553.)

Hearing and Postponements

We would appreciate knowing in advance if you or a representative of your agency will testify at the hearing, and if other witnesses will also appear. Please see section 1183.01 of the regulations concerning timelines and requesting postponements of hearings.

Thank you for your patience regarding the preparation of this draft staff analysis and the scheduling of this test claim for hearing.

Should you have questions or need additional information, please contact Mr. Steve Zimmerman, (916) 323-3562, the Program Analyst assigned this test claim.

Sincerely,



KIRK STEWART
Executive Director

Encl. All: Draft Staff Analysis of CSM-4419
Mr. Everroad only: Regulations adopted 6/27/96

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Hearing Date: February 27, 1997
File Number: CSM-4419A
Staff: Steve Zimmerman
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DRAFT STAFF ANALYSIS OF TEST CLAIM

California Fire Incident Reporting System

as promulgated by the State Fire Marshal in the
July 1990 California Fire Incident Reporting System Manual
New CFIRS Manual

Executive Summary

The City of Newport Beach alleges that the California Fire Incident Reporting System, as redesigned and described in the July 1990 California Fire Incident Reporting System Manual, imposes a new program or a higher level of service in an existing program on local fire agencies within the meaning of article XIIB, section 6 of the California Constitution and Government Code section 17514.

The Department of Finance notes that the 1990 California Fire Incident Reporting System (CFIRS) Manual may constitute a limited state-mandated local program, citing the provision requiring that data be provided on diskette or magnetic tape as a new requirement which have resulted in some fire protection agencies having to acquire computer capability by lease or purchase. The Department of Finance also notes that the Commission has heard and denied a test claim based on a very similar factual situation involving the California School Accounting Manual. The Department of Finance observes that, in that decision, the Commission found that, since school districts had been required since at least 1964 to comply with the California School Accounting Manual, subsequent changes did not constitute a reimbursable mandate because it did not alter the underlying requirement to provide the data prescribed in the California School Accounting Manual. The Department of Finance contends that the same rationale would apply to the 1990 revision to the California Fire Incident Reporting System.

The State Fire Marshal notes that the requirement to submit data in electronic form may constitute a very narrow and limited higher level of service in an existing local program for those agencies without any access to a personal computer. The State Fire Marshal also contends that the type and net amount of data to be reported for fire incidents is essentially the same as under the former CFIRS Manual.

Staff recommends that the Commission find that the portions of the new CFIRS Manual pertaining to emergency medical and hazardous materials incidents are an executive order

which establishes a new program, as defined in section 6, article XIII B of the California Constitution and Government Code section 17514.

Staff recommends that the Commission find that the change in the injury reporting threshold from "injury requiring hospitalization" to an "injury requiring 1) treatment; 2) consultation with a doctor; or 3) (for fire service personnel only) at least one day of restricted activity following the incident" constitutes a higher level of service in an existing program, as defined in section 6, article XIII B of the California Constitution and Government Code section 17514.

Staff recommends that the Commission find that the new data elements added by the new CFIRS Manual pertaining to fire incidents may constitute a higher level of service in an existing program, as defined in section 6, article XIII B of the California Constitution and Government Code section 17514, but that the Commission take testimony to determine the extent to which the level of service caused by these new data elements must be offset by reductions to the level of service resulting from data elements which have been deleted from the new CFIRS Manual, but which were required under the old CFIRS Manual.

Staff recommends that the Commission find that, because of the extensive changes which have been made in the data coding system, legally necessary one-time costs for providing changeover training to fire agency staff in the new system are costs mandated by the state.

Staff recommends that the Commission find that the change from paper-based to diskette submission of reports constitutes a state mandated program and that the legally necessary one time costs for implementation of this change are costs mandated by the state.

Staff recommends that the Commission take testimony to determine whether the new CFIRS Manual may provide for cost savings to local agencies, by reducing the number of report filing periods over the course of a year from twelve to four and by changing that reporting to a paperless format.

Staff recommends that the Commission find that all other increased costs alleged by claimant do not constitute a reimbursable state mandate, in accordance with the principles set forth decision in *County of Los Angeles v. State of California*, (1987) 43 Cal.3d 46, in which the California Supreme Court determined that increased costs are not tantamount to an increased level of service in an existing program, as defined in section 6, Article XIII B of the California Constitution and Government Code section 17514.

Claimant: City of Newport Beach (replaced San Ramon Valley Fire Protection District as claimant)

Chronology

12-31-91 Test Claim received by Commission on State Mandates
 1-15-92 Test Claim hearing date of August 27, 1992 set

- 7-01-92 Continuanace requested by State Fire Marshal
- 9-24-92 Response received from State Fire Marshal (Attachment C)
- 9-28-92 Response received from Department of Finance (Attachment B)
- 10-28-92 Continuanace requested by San Ramon Valley Fire Protection District
- 4-05-93 Letter sent by Commission to claimant requesting time frame for claimant's response so that a new hearing date can be set
- 6-13-96 City of Newport Beach replaces San Ramon Fire Protection District as claimant (Attachment A)

Claimant's Allegations

The City of Newport Beach (Claimant) alleges that the new California Fire Incident Reporting System (CFIRS) Manual has expanded the 10 reporting categories to approximately 100 categories. Some of these categories are optional, and claimant states that these optional categories are not included in the test claim.

Claimant further alleges that the new CFIRS Manual has expanded the one page reporting form to three pages. Two sections were added to the original form, each of which requires a separate page to complete. These two new sections are for fire service casualties, and non-fire service (civilian) casualties.

Claimant notes that both the reporting frequency and method have changed. Under the old CFIRS Manual, reports were filed monthly, and could be filed either as paper forms or by magnetic tape. Under the new CFIRS Manual, quarterly reports are required, and must be filed electronically, on either diskette or magnetic tape.

Claimant observes that, in order to provide the necessary information for local agencies to comply with the new CFIRS Manual, the manual or code book as been increased from approximately 100 pages to over 500 pages.

Claimant alleges both implementation costs and ongoing reporting and operational costs of over \$200 as a result of the implementation and conversion of CFIRS from the old manual system to the new computerized system.

Test Claim Background: New California Fire Incident Reporting System Manual

Chapter 768, Statutes of 1972 amended section 13110.5 of the Health and Safety Code to require the State Fire Marshal (SFM) to gather and report on information concerning each fire incident in the state. This chapter also authorized the SFM to adopt regulations prescribing the scope of the information to be reported, the manner of reporting such information, forms to be used, the time such information shall be reported, and such other requirements and regulations as he or she deems necessary. Chapter 345, Statutes of 1987, further amended this section as shown below.

Health and Safety Code section 13110.5 as last amended by Chapter 345, Statutes of 1987, reads:

“The State Fire Marshal shall gather statistical information on all fires, *medical aid incidents, and hazardous materials incidents* occurring within this state. The chief fire official of each fire department operated by the state, a city, city and county, fire protection district, organized fire company, or other public or private entity which provides fire protection, shall furnish information and data to the State Fire Marshal relating to each fire which occurs within his *or her* area of jurisdiction. *The chief fire official of each fire department operated by the state shall, and the chief fire official of each fire department operated by a city, city and county, fire protection district, organized fire company, or other public or private entity which provides fire protection may, also furnish information and data to the State Fire Marshal relating to medical aid incidents and hazardous materials incidents which occur within their area of jurisdiction.* The State Fire Marshal shall adopt regulations prescribing the scope of the information to be reported, the manner of reporting the information, the forms to be used, the time the information shall be reported, and other requirements and regulations as *the State Fire Marshal* determines necessary.

“The State Fire Marshal shall annually analyze the information and data reported, compile a report, and disseminate a copy of the report, together with his *or her* analysis, to each chief fire official in the state. The State Fire Marshal shall also furnish a copy of his *or her* report and analysis to *the State Emergency Medical Services Authority and any other interested person upon request.*”

(Additions made by Chapter 345/87 in italics.)

Staff has reviewed the regulations promulgated by the SFM in Title 19 of the California Code of Regulations, and was unable to locate any regulations (other than the CFIRS Manual itself, which was acknowledged to be an executive order by the SFM) which prescribe the scope of the information to be reported, the manner of reporting the information, the forms to be used, the time the information shall be reported, and other requirements and regulations deemed necessary by the SFM, as required by Health and Safety Code section 13110.5. Staff concludes that the CFIRS Manual constitutes the statement of these reporting requirements promulgated by the SFM pursuant to Health and Safety Code section 13110.5.

In 1974, the SFM implemented a fire reporting system, called the California Fire Incident Reporting System (CFIRS). The first CFIRS manual, issued in January 1974, required fire agencies to submit monthly reports, beginning in January 1974, using either paper forms or on computer magnetic tape. Reports on magnetic tape were to be submitted not later than the last day of the month, while reports submitted on the paper forms were to be submitted not later than the 15th day of the following month.

In July 1990, following several years of work, the SFM issued the version 1.0 of the new CFIRS Manual, to take effect by January 1, 1992. This version of the manual made the following changes in the CFIRS system:

- Reports are to be submitted quarterly (rather than monthly), no later than the 15th of the following month.
- Reports must be submitted on diskette or magnetic tape. Diskettes may be in Macintosh format, or IBM compatible, and the SFM will attempt to facilitate those departments having equipment other than PC or Macintosh, and will work with them on a one to one basis. The magnetic tape reporting option is substantially unchanged.
- New forms, designated as CFIRS-1, CFIRS-2, and CFIRS-3, replace the former SFM form GO-60 and SFM GO-1. Unlike the SFM forms GO-60 and GO-1, however, these forms are not used to transmit information from the local fire department to the SFM. They are provided as a *guide* to the data to be collected, and *may* be used at the scene of a fire incident for data collection purposes, and taken to a central data entry location for keying.

Response from the Department of Finance

The Department of Finance (DOF) notes that the 1990 CFIRS may constitute a limited state-mandated local program. DOF states, "Specifically, the provision requiring that data be provided only on diskette or magnetic tape was a new requirement and may have resulted in some fire protection agencies having to acquire computer capability by lease or purchase."

DOF observes, "The SFM advises that the quantity of data to be reported in the new format has not increased and will provide evidence to substantiate that point in both their written recommendation and in their oral testimony before the Commission"

DOF also notes that the Commission has heard and denied a test claim (CSM-4356) [Attachment D] based on a very similar factual situation involving the California School Accounting Manual (CSAM). DOF observes that, in that decision, the Commission found that, since school districts had been required since at least 1964 to comply with CSAM, subsequent changes in CSAM did not constitute a reimbursable mandate because it did not alter the underlying requirement to provide the data prescribed in CSAM. DOF contends that the same rationale would apply to the 1990 revision to CFIRS.

Response from the State Fire Marshal

The SFM acknowledged that the requirement to submit data in electronic form may constitute a very narrow and limited higher level of service in an existing local program for those agencies without any access to a personal computer. The SFM also contends that the type and net amount of data to be reported for fire incidents is essentially the same. The SFM states, "... the updated system provides the fire department the optional capability to capture information on all emergency incidents; however, the mandated reporting applies only to fires, which is unchanged from the original requirement which has been in place for 18 years."

With respect to the allegation that the reporting system was expanded from 10 to 100 items, the SFM notes that some of the titles of data fields were changed to be consistent with the national standard, however, the data being collected did not change - only the field titles are different. The SFM states, "When comparing the required data elements between the original and

updated versions, the number is substantially the same. This takes into account: (1) the fields that are identical; (2) those fields called by a different name; (3) multiple fields combined into a single field; (4) the optional fields; (5) the fields that are for local use only; and (6) the net difference between the added fields versus the deleted ones.”

The SFM further states, “An important factor to be considered is that all the entries are not required all the time - it depends on the scenario. For instance, the added field ‘Detection System Reason for Failure’ would only be required for an incident where: (1) the fire was in a building; (2) the building had a detection system; and (3) the detection system failed. This holds true for a major portion of the entries.”

The SFM reports that the CFIRS Advisory Committee performed a side-by-side analysis of the original and updated versions of CFIRS, and concluded there is no substantial difference in the level of service required to complete the reports. The SFM has also reviewed the reporting requirements, and concluded that they are fundamentally the same, that only the prescribed format has changed.

The SFM notes that the purpose of CFIRS is to collect and share information for mutual benefit at the local and state level, with the ultimate beneficiaries being the citizens of California. SFM states, “In light of this long standing local-state partnership, the CSFM has never attempted to enforce the mandatory provisions of the program, nor is it our intention to do so in the future.”

Staff Analysis

Issue

Do the requirements promulgated in the July 1990 CFIRS Manual impose a new program or a higher level of service in an existing program upon local agencies within the meaning of article XIII B, section 6 of the California Constitution and Government Code section 17514?

The activities required of local agencies under the 1990 CFIRS Manual fall into two discrete categories - implementation activities and ongoing reporting activities. Staff will examine each of the claimant’s allegations for each type of activity.

Submission on Diskette

Both the original CFIRS Manual and the 1990 CFIRS Manual provide two filing options, but selection of one option or the other is required. One of these options - reporting on computer tape - still exists. The other option, however, has changed from a paper-based data submission option to a personal computer based diskette submission option. Entities which have heretofore sent in their CFIRS reports on paper may experience one-time implementation costs for the acquisition of computer hardware, software, and training, or for (for example) contracting with another entity which has the capability to produce the data on diskette or tape for submission.

The required change from a paper-based data submission option to a diskette based submission option meets the definition set forth by the Supreme Court in *County of Los Angeles v. State of California*, (1987) 43 Cal.3d 46, at 56, in which the term 'program' is defined to include "... or laws which, to implement a state policy, impose unique requirements on local governments and do not apply generally to all residents and entities in the state."

The Court, in *County of Los Angeles*, determined that increased costs, in and of themselves, are not tantamount to an increased level of service in an existing program. In view of the Court's definition of 'program' (above), however, staff finds that the change from the paper-based reporting option to the diskette based reporting option is a unique requirement imposed on fire agencies which does not apply generally to all entities in the state. Staff therefore concludes that the legally necessary one-time costs for implementation of the diskette based reporting system by entities which had, in the past, submitted their reports on paper do constitute a reimbursable state mandate, in accordance with the principles set forth in *County of Los Angeles*.

Staff observes, however, that the requirement to submit information in electronic form does not *require* the reporting agency to acquire a computer and software. An alternative would be to contract with another agency which already possesses the computer hardware and software. Staff notes that the SFM mentions in their response that roughly 111 small volunteer fire departments report on computer tape through the California Department of Forestry and Fire Protection. Staff also notes that the SFM mentions in their response that approximately 55 fire departments have submitted about 60 percent of the total statewide fire incidents via computer tape annually, and that this method of reporting has always been an option under CFIRS. Thus, the elimination of the paper-based reporting option would have had no impact on those entities which had used the computer tape reporting option.

Expansion of Reporting Categories

With respect to the allegation that the new CFIRS manual has expanded ten reporting categories to approximately 100 categories, staff notes that claimant, on page 2 of the test claim, lists a number of reporting categories which are alleged to be new required reporting categories. These are:

- Dispatch time, Arrival Time, End Time, Additional days, First In Company
- Total Fire Service Personnel Responded - career and volunteer
- Number of Apparatus Responded - engine, truck, medical rescue and other
- Information for Mobile Property Involved
- Type of Action Taken - contributing factors, method of extinguishment
- Equipment Involved in Ignition - type, model, serial number, etc.
- For Structure Fires - roof covering, number of stores, etc.
- Other Actions Taken and Special Studies

The *Data Element Comparison Between the Original and the Updated CFIRS Report*, provided by the SFM as a part of their response [Attachment C], reveals the following:

- 12 data elements were shown as added by the new CFIRS Manual;
- 9 data elements were shown as deleted by the new CFIRS Manual;
- 13 data elements were shown as the same by the new CFIRS Manual;
- 27 optional data elements were added by the new CFIRS Manual; and
- 25 groups of data elements were identified as 'same-as'; that is, renamed or consolidated, but containing the same or similar information.

With respect to these 'same-as' data elements, staff observes that the SFM states that 41 data elements in the old report became 28 data elements in the new CFIRS manual - a consolidation which resulted in a reduction of 13 data elements.

Please refer to:

Exhibit 1 for samples of the old CFIRS Forms

Exhibit 2 for samples of the new CFIRS Forms

Exhibit 3 for Commission Staff's analysis of CFIRS report form requirements

A review of the CFIRS-1 Incident Report form by Commission staff shows that sections A, B, and C of the new form cover the same fire-related data as was formerly reported in sections A through I of the SFM GO-60. Section D of the CFIRS-1 reports the same data as section J of the SFM GO-60, and Sections E, F, and G of the CFIRS-1 form are new. Staff finds that sections A through J of the SFM GO-60 are the "ten reporting categories" alleged by the claimant, and that these correspond with sections A through D of the CFIRS-1 form. Thus, the former "ten reporting categories" have actually become 4 reporting categories on the new form, and that 3 new sections (E, F, and G) have been added. In terms of the data contained in the "ten reporting categories," however, the SFM GO-60 form contained 59 data elements in sections A through J. The CFIRS-1 form contains 79 data elements in sections A through D, of which 5 are optional and 74 are required. Staff finds that this represents an increase of 15 required data elements, or roughly a 25 percent increase in the number of data elements contained in the "ten reporting categories."

Staff finds that the new data elements added by the new CFIRS Manual pertaining to fire incidents may constitute a higher level of service in an existing program, but notes that any additions to the level of service caused by these new data elements must be offset by reductions to the level of service resulting from data elements which have been deleted from the new CFIRS Manual but which were required under the old CFIRS Manual. Staff concludes that a determination of the facts on this issue of offsetting savings must be made by testimony at a public hearing, pursuant to section 17556 of the Government Code.

The new sections of the CFIRS-1 form deal with emergency medical incidents and hazardous materials incidents. Staff notes that, while the explicit language of Health and Safety Code section 13110.5 makes these reports optional with respect to local agencies ("...the chief fire official of each fire department operated by a city, city and county, fire protection district, organized fire company, or other public or private entity which provides fire protection may, also furnish information and data to the State Fire Marshal relating to medical aid incidents and

hazardous materials incidents which occur within their area of jurisdiction.”), the SFM has acknowledged that the new CFIRS Manual is an executive order, and the sections of the manual which deal with these sections of the report characterize these data elements as required rather than optional. Staff finds that the requirements to complete sections E, F, and G of the report do constitute a new program, as defined in section 6, Article XIII B of the California Constitution and Government Code section 17514.

Staff concludes that the expansion of categories from ten to over 100 as alleged by the claimant has not taken place, in light of the data element changes detailed above. Staff further concludes that, because of the extensive changes which have been made in the data coding system, legally necessary one-time costs for providing changeover training to fire agency staff in the new system will be incurred, and these costs are costs mandated by the state. Staff also concludes that the addition of emergency medical and hazardous materials incidents to the CFIRS reporting system do constitute a new program, as defined in section 6, Article XIII B of the California Constitution and Government Code section 17514.

Expansion of Form from One to Three Pages

With respect to the allegation that a single-page form has been expanded to three pages, staff observes that the old CIFRS manual contained two forms rather than one. The first form was the SFM GO-60 incident report, and the second was the SFM GO-1 casualty report. Thus, claimant’s allegation that a single form has become three forms is incorrect on its face. Staff finds that the old incident report form, SFM GO-60, has become CFIRS-1, and that the old casualty report form SFM GO-1, has become CFIRS-2 and CFIRS-3.

Staff notes that the SFM, in its response, states that there has always been a requirement to submit a casualty report, but that the previous form (SFM GO-1), which was used for either a civilian or a firefighter casualty, has been replaced with separate forms for civilian and firefighter casualties, due to the different types of information needed on the civilian and the firefighter casualties. The SFM states, “The requirement to submit a casualty report is unchanged. The fire department merely uses the report [form] appropriate for the circumstances.”

In reviewing the old and new forms, staff notes that a number of data elements on the old form are used on only one of the new forms. For example, the data elements titled “Familiarity with Structure”, “Location of Victim at Time of Ignition”, and “Condition Preventing Victim’s Escape” (Items C, D and F on the old form) appear only on the new Non-Fire Service Casualty Report. However, there is nothing in the old manual or on the old form to indicate that these data elements were needed only for non-fire-service casualties. The separation of the old SFM GO-1 form into the CFIRS-2 and CFIRS-3 forms has clarified which data elements apply to which type of casualty. Moreover, on the CFIRS-2 and CFIRS-3 forms, the “comments” field is optional, where the former “Summary” field was required, and required the submitting agency to “describe how the casualty occurred” – a requirement which encompasses the information in every new field contained in the CFIRS-2 and -3 forms. Staff finds that information required to complete either the CFIRS-2 or the CFIRS-3 is substantially the same as was required to complete the SFM GO-1, and that no additional activities on the part of the fire department are required to complete the new casualty reports.

Staff notes, however, that the old CFIRS manual required the submittal of a SFM GO-1 form for each death or injury requiring hospitalization. While a CFIRS-2 or -3 form is still required for each death, the submittal requirement for injuries has changed from “injury requiring hospitalization” to an injury requiring 1) treatment; 2) consultation with a doctor; or 3) (for fire service personnel only) at least one day of restricted activity following the incident.

Staff concludes that the expansion from a one page form to a three page form as alleged by the claimant has not taken place. Staff further concludes that the change in the threshold for injury reporting from “injury requiring hospitalization” to an injury requiring 1) treatment; 2) consultation with a doctor; or 3) (for fire service personnel only) at least one day of restricted activity following the incident does constitute an increased level of service as defined in section 6, Article XIII B of the California Constitution and Government Code section 17514.

Increased Size of Manual

Claimants also allege that the size of the CFIRS manual has increased from approximately 100 pages to over 500 pages. While this is true, it is not relevant to the existence of a reimbursable state mandated local program. The existence of a reimbursable state mandated local program can be determined only by the requirements imposed by the manual, not by its size. The SFM states:

“It is erroneous to make a direct comparison between the sizes of the two manuals because:

- “the new manual contains the instructions for using all the optional (non-fire) components of the reporting system;
- “the format of the new manual has been expanded to include additional explanatory information to enhance its understanding and user-friendliness;
- “the print style and page layout of the new manual is designed with more open space for easier reading, and to make it convenient to add user notes, resulting in more pages;
- “the tables of codes have been updated for the first time in 18 years, and are reproduced in the manual for convenient reference. The number of codes are significantly larger so as to provide a more accurate and definitive selection for the user.”

A staff comparison of the new manual and the old manual reveals:

- Two sections have been added which deal with activities which were added to Health & Safety Code § 13110.5 by Chapter 345/87 - emergency medical calls and hazardous materials incidents. These sections are twelve pages long and 76 pages long, for a total of 88 new pages dealing with these programs. These 88 pages did not exist in the old manual.
- The section in the old manual dealing with casualty reports, which was one page long, has become two sections, dealing with fire service casualty reports and non-fire-service (civilian) casualty reports. These sections are 60 pages and 49 pages long, respectively, for a total of 108 new pages dealing with casualties. These 108 pages provide information on completing the casualty reports which was not provided in the old manual.

- The Individual Fixed Property Use codes, which take up 17 pages in the old manual, are called Specific Property Use codes in the new manual, and take up 54 pages. In addition, an alphabetic list of the Specific Property Use codes (which is actually the format used for the Individual Fixed Property Codes in the old manual), contained in Appendix E-1, takes up another 47 pages, for a total of 84 new pages dealing with property use codes. These 84 pages are made up of 54 pages which provide information on the codes which was not provided in the old manual, and a 30 page net increase in the size of the alphabetic listing of the codes (17 pages in the old manual, 47 pages in the new manual due to type size and layout changes).
- Many of the tables in the old manual are printed in six or eight point type. The listings in the new manual are printed in larger type, making them easier to read, but taking up more space.
- Each data element in the new manual contains a definition of the data element, a statement of the purpose for which the data is being collected, instructions on data entry, and examples of specific cases, showing how the data was coded and entered. Moreover, each data element starts on its own page in the manual, therefore, each one takes up at least one page, even if the page is not completely full. In contrast, the old manual does not have definitions or purpose statements, and often covers more than one data element on a single page.

Staff submits that, if only the additional pages noted above are subtracted from the totals, the alleged 400 page increase in the size of the manual is reduced by the 280 new pages, becoming a 120 page increase in the material dealing with fire incidents. Staff further submits that most, if not all, of the remaining 120 page increase in size can be accounted for by the increase in type size and one data element per page layout noted above.

Staff concludes that, while the new CFIRS manual is indeed larger than the old CFIRS manual, that change itself does not constitute an increase in the level of service required to be provided by the manual. Rather, it is the requirement to carry out new programs or to provide a higher level of service in an existing program which would be germane, and these requirements cannot be discerned merely by looking at the size of the manual.

Level of Service and Possible Cost Savings

Should the Commission find a new program or higher level of service in an existing program resulting from the promulgation of the new CFIRS Manual, an additional task would be to verify the reimbursability of such a new program or higher level of service.

The Commission cannot find costs mandated by the state, as defined in Section 17514, in any claim submitted by a local agency, "... if, after a hearing, the commission finds that: ...The statute or executive order provides for offsetting savings to local agencies or school districts which result in no net costs to the local agencies or school districts...." (Gov. Code, § 17556 (e).)

Staff notes that furnishing CFIRS information in diskette form is a new option (submission on computer tape was previously the other option, and remains so) which replaces the option of

furnishing this information on paper forms.¹ Staff submits that both the replacement of the manual, paper-based CFIRS reporting system option with the current option which provides for the submission of CFIRS information in diskette form, and the change from monthly to quarterly submission of reports, could result in ongoing cost savings for local agencies. Staff finds that some areas in which cost savings may occur include (but are not limited to):

- Postage and handling costs for sending the diskette or tape to SFM quarterly rather than monthly - the fire department does four mailings rather than twelve, saving the costs of eight mailings.
- Postage and handling cost savings for mailing a computer diskette, rather than a stack of paper forms. (Applies only to fire departments not reporting on computer tape.)
- EDP costs savings from creating only 4 tapes per year, rather than 12. (Applies only to fire departments reporting on computer tape.)

Staff further submits that the ongoing activity of providing CFIRS information quarterly in diskette or computer tape form rather than monthly in either paper or computer tape form, is arguably a lower level of service than the old manual's required monthly submission.

Conclusion

Claimant has alleged: "The new CFIRS system clearly represents a major increase in the level of service required to be provide by local agencies to the state. The staff time, materials, and equipment necessary for fire service agencies to comply with the expanded requirements has resulted in increased costs to the City of Newport Beach and to all other local fire agencies that are or will be complying with the new mandate." However, the SFM has stated that there has been no change in the underlying services and functions provided by California fire departments in preparing these reports, that only the prescribed format of the reports has changed.

Nonetheless, staff's independent analysis has revealed several new programs and potential increases in levels or service which are required by the new CFIRS Manual:

Staff concludes that the portions of the new CFIRS Manual pertaining to emergency medical and hazardous materials incidents are an executive order which establishes a new program, as defined in section 6, Article XIII B of the California Constitution and Government Code section 17514.

Staff concludes that the new data elements added by the new CFIRS Manual pertaining to fire incidents may constitute a higher level of service in an existing program, but that any additions to the level of service caused by these new data elements must be offset by reductions to the level of service resulting from data elements which have been deleted from the new CFIRS Manual but which were required under the old CFIRS Manual. Staff concludes that a determination of the facts on this issue must be made by testimony at a public hearing.

¹ While two reporting medium options exist, the use of one option or the other is required.

Staff concludes that, because of the extensive changes which have been made in the data coding system, legally necessary one-time costs for providing changeover training to fire agency staff in the new system are costs mandated by the state.

Staff concludes that the change in the injury reporting threshold from “injury requiring hospitalization” to an “injury requiring 1) treatment; 2) consultation with a doctor; or 3) (for fire service personnel only) at least one day of restricted activity following the incident” constitutes a higher level of service in an existing program, as defined in section 6, Article XIII B of the California Constitution and Government Code section 17514.

Staff concludes that the change from paper-based to diskette submission of reports meets the second definition of ‘program’ set forth in *County of Los Angeles v. State of California*, (1987) 43 Cal.3d 46, at 56, and that the legally necessary one time costs for implementation of this change are costs mandated by the state.

Staff concludes that the balance of the new CFIRS Manual does not constitute a higher level of service in an existing program because:

- The increased size of the manual it is not relevant to the existence of a reimbursable state mandated local program;
- The expansion of the form from one page to three pages as alleged by the claimant did not take place.

Staff concludes that the change from monthly to quarterly submission of reports may result in cost savings to local agencies, and that the amount of such cost savings should be determined by testimony at a public hearing before the Commission.

Staff Recommendation

Staff recommends that the Commission find that the portions of the new CFIRS Manual pertaining to emergency medical and hazardous materials incidents are an executive order which establishes a new program, as defined in section 6, article XIII B of the California Constitution and Government Code section 17514.

Staff recommends that the Commission find that the change in the injury reporting threshold from “injury requiring hospitalization” to an “injury requiring 1) treatment; 2) consultation with a doctor; or 3) (for fire service personnel only) at least one day of restricted activity following the incident” constitutes a higher level of service in an existing program, as defined in section 6, article XIII B of the California Constitution and Government Code section 17514.

Staff recommends that the Commission find that the new data elements added by the new CFIRS Manual pertaining to fire incidents may constitute a higher level of service in an existing program, as defined in section 6, article XIII B of the California Constitution and Government Code section 17514, but that the Commission take testimony to determine the extent to which the level of service caused by these new data elements must be offset by reductions to the level of service resulting from data elements which have been deleted from the new CFIRS Manual but which were required under the old CFIRS Manual.

Staff recommends that the Commission find that, because of the extensive changes which have been made in the data coding system, legally necessary one-time costs for providing changeover training to fire agency staff in the new system are costs mandated by the state.

Staff recommends that the Commission find that the change from paper-based to diskette submission of reports constitutes a state mandated program and that the legally necessary one time costs for implementation of this change are costs mandated by the state.

Staff recommends that the Commission take testimony to determine whether the new CFIRS Manual may provide for cost savings to local agencies, by reducing the number of report filing periods from twelve to four in a paperless format.

Staff recommends that the Commission find that all other increased costs alleged by claimant do not constitute a reimbursable state mandate, in accordance with the principles set forth decision in *County of Los Angeles v. State of California*, (1987) 43 Cal.3d 46, in which the California Supreme Court determined that increased costs are not tantamount to an increased level of service in an existing program, as defined in section 6, article XIIB of the California Constitution and Government Code section 17514.

EXHIBIT 1

OLD CFIRS REPORT FORMS

FORM GO-60

FORM GO-1

Entries contained in this report are intended for the sole use of the State Fire Marshal. Estimations and evaluations made herein represent "most likely" and "most probable" cause and effect. Any representation as to the validity or accuracy of reported conditions outside the State Fire Marshal's office, is neither intended nor implied.

STATE OF CALIFORNIA
OFFICE OF THE STATE FIRE MARSHAL
FIRE INCIDENT REPORT

INCIDENT NO.			

DEL	CORR
<input type="checkbox"/>	<input type="checkbox"/>

(DEPARTMENTAL USE)

FIRE DEPARTMENT

1	UPRANT NAME	RELATIONSHIP	ALARM SOURCE	TEL. BOX	PFAS	RADIO
2	ADDRESS	ROOM / APT. NO.	CITY	ZIP	VERBAL	OTHER
3	OWNER NAME	ADDRESS	CITY	ZIP	CENSUS/PARCEL NO.	
4	MANAGER NAME	ADDRESS	CITY	ZIP	TELEPHONE NO.	

A. INFORMATION (PAGE 17)

1	FIRE DEPT. ID	INCIDENT NO.	EXPOSURE NO.	TIME	MONTH	DAY	YEAR	DAY CODE	COUNTY OF FIRE	DIST/ CITY	OUT OF JURISDICTION
											CHECK IF YES <input type="checkbox"/>

B. PROPERTY CLASSIFICATION (PAGE 19)

1	CODE	TYPE OF INCIDENT	CONSTR. DATE PRE 72 POST 71
2	CODE	PROPERTY CLASSIFICATION (COMPLEX)	
3	CODE	PROPERTY CLASSIFICATION (INDIVIDUAL)	

C. PROPERTY TYPE (PAGE 41)

1	PROPERTY MANAGEMENT	STATE	COUNTY	CITY	DISTRICT	FOREIGN	OTHER
2	CODE	STRUCTURE, BUILDING OR VEHICLE - PROPERTY TYPE	BUILDING NO. STORIES				
3	STRUCTURE, BUILDING	- CONSTRUCTION TYPE		FLOOR - ROOF		FIRE RATED	
	EXT. WALL	INT. WALL	FLOOR	ROOF	YES	NO	
	N/C	COMB	N/C	COMB			

D. EXTENT OF DAMAGE (PAGE 45)

1	CODE	EXTENT OF DAMAGE - FIRE
2	CODE	EXTENT OF DAMAGE - SMOKE
3	CODE	EXTENT OF DAMAGE - WATER
4	ESTIMATED LOSS - PROPERTY	ESTIMATED LOSS - CONTENTS

E. LOCATION & CAUSE (PAGE 49)

1	CODE	LEVEL OF ORIGIN
2	CODE	SOURCE OF HEAT CAUSING IGNITION
3	CODE	FORM OF HEAT CAUSING IGNITION
4	CODE	ACT OR OMISSION CAUSING IGNITION

F. AREA, MATERIALS & SMOKE SPREAD (PAGE 63)

1	CODE	AREA OF ORIGIN
2	CODE	TYPE OF MATERIAL FIRST IGNITED
3	CODE	FORM OF MATERIAL FIRST IGNITED
4	CODE	MAIN AVENUES SMOKE SPREAD

G. SPREAD OF FIRE (PAGE 77)

1	CODE	MAIN AVENUES FIRE SPREAD
2	CODE	TYPE MATERIAL CAUSING SPREAD
3	CODE	FORM MATERIAL CAUSING SPREAD
4	CODE	ACT OR OMISSION CAUSING SPREAD

H. PROTECTION FACILITIES (PAGE 91)

1	CODE	SPRINKLERS - TYPE
2	CODE	SPRINKLERS - EFFECTIVENESS
3	CODE	STANDPIPES - TYPE
4	CODE	STANDPIPES - EFFECTIVENESS
5	CODE	PORTABLE EXTINGUISHERS - TYPE
6	CODE	PORTABLE EXTINGUISHERS - EFFECTIVENESS

I. PROTECTION FACILITIES (PAGE 97)

1	CODE	PRIVATE BRIGADE - TYPE			
2	CODE	PRIVATE BRIGADE - EFFECTIVENESS			
3	CODE	SPECIAL HAZARD PROTECTION - TYPE			
4	CODE	SPECIAL HAZARD PROTECTION - EFFECTIVENESS			
5	CODE	SIGNAL OR WARNING SYSTEM	TYPE	CODE	EFFECTIVENESS
6	CODE	SIGNAL WARNING SYSTEM - MEANS OF ACTIVATION			
7	CODE	SIGNAL WARNING SYSTEM - TYPE DETECTORS			
8	CODE	WATCHMAN EFFECTIVENESS	CODE	OTHER FACILITIES EFFECTIVENESS	

J. MISCELLANEOUS (PAGE 109)

1	FIREFIGHTER	CIVILIANS		
	NO. INJURED	NO. OF DEATHS	NO. INJURED	NO. OF DEATHS
2	SFM FORM 60-1 SUBMITTED FOR EACH DEATH (CHECK BOX IF YES) <input type="checkbox"/>			

CFIRS CODE BOOK



FIRE CASUALTY REPORT INJURY (only those requiring hospital treatment) OR DEATH



50-1 (1/79)

FIRE DEPARTMENT

A. - IDENTIFICATION											
FIRE DEPT. ID	INCIDENT NO.	EXPOSURE NUMBER	TIME	MONTH	DAY	YEAR	DAY CODE	COUNTY OF FIRE	VICTIM NUMBER	DCL	CORR

B. - CASUALTY TYPE			
CASUALTY LAST NAME	FIRST NAME	MI	AGE
CITY OR TOWN OF RESIDENCE		STATE	TELEPHONE

SEX 1 <input type="checkbox"/> MALE 2 <input type="checkbox"/> FEMALE	RACE 1 <input type="checkbox"/> WHITE 2 <input type="checkbox"/> NON-WHITE	CASUALTY TYPE 1 <input type="checkbox"/> FIRE CASUALTY 2 <input type="checkbox"/> ACTION CASUALTY	SEVERITY 1 <input type="checkbox"/> INJURY 2 <input type="checkbox"/> DEATH	AFFILIATION 1 <input type="checkbox"/> FIRE SERVICE 2 <input type="checkbox"/> OTHER EMERGENCY PERSONNEL	ADMITTED FACTORS 1 <input type="checkbox"/> COLLISION 2 <input type="checkbox"/> SUICIDE 3 <input type="checkbox"/> HOMICIDE
---	--	---	---	--	---

C. - FAMILIARITY OF VICTIM WITH STRUCTURE	
1.	Less than 1 day
2.	1 to 7 days.
3.	8 to 30 days.
4.	1 to 2 months.
5.	3 to 6 months.
6.	7 to 12 months.
7.	Over 1 year.
8.	Not a structure.
9.	Undetermined or not reported.*

D. - LOCATION OF VICTIM AT TIME OF IGNITION	
1.	Fire casualty intimately involved with ignition. Includes are ignition of clothing on a person and ignition of bedding or furniture on which a person is sitting or lying.
2.	Fire casualty in the room or space of fire origin. Includes vehicle compartments, porches, tents, and play-house
3.	Fire casualty on same floor as origin of fire.
4.	Fire casualty in same building as origin of fire.
5.	Fire casualty outside of building of fire origin but on property.
6.	Fire casualty off property of fire origin at time of ignition.
7.	Not a fire casualty.
8.	Not classified above.*
9.	Undetermined or not reported.*

E. - CAUSE OF CASUALTY	
1.	Trapped by (1) = HAT _____
2.	Exposed to fire products. Include flame, heat, smoke, and gas.
3.	Exposed to chemicals, radiation. Excluded are fire products reported in 2.
4.	Fell or stepped on, over, into (1) = HAT _____
5.	Overexertion.
6.	Rubbed by, contact with (1) = HAT _____
7.	Struck by (1) = HAT _____
8.	Not applicable.
9.	Not classified above.*
0.	Undetermined or not reported.*

F. - CONDITION PREVENTING VICTIM'S ESCAPE	
1.	No time to escape; explosion or fire progressed too rapidly.
2.	Fire between casualty and exit.
3.	Locked door.
4.	Illegal gates, locks.
5.	Clothing on casualty burning.
6.	Moved too slowly. Includes are failures to follow correct (available) escape procedures.
7.	Victim incapacitated prior to ignition.
8.	No conditions prevented escape or not a factor.
9.	Not classified above.*
0.	Undetermined or not reported.*

G. - CONDITION BEFORE INJURY	
1.	Asleep.
2.	Bedridden, or physical handicap.
3.	Impaired by drugs, alcohol.
4.	Under restraint.
5.	Too young to act.
6.	Too old to act.
7.	Mentally handicapped, senile.
8.	Awake, unimpaired.
9.	Not classified above.*
0.	Undetermined or not reported.*

H. - NATURE OF CASUALTY	
1.	Burns and asphyxia/smoke.
2.	Burns only.
3.	Asphyxia/smoke only.
4.	Wound, cut, bleeding.
5.	Dislocation, fracture.
6.	Complaint of pain. Included are heart attacks and strokes.
7.	Shock.
8.	Strain, sprain.
9.	Not classified above.*
0.	Undetermined or not reported.*

I. - ACTIVITY AT TIME OF CASUALTY	
1.	Escaping.
2.	Rescue attempt.
3.	Fire control.
4.	Response/return.
5.	Cleanup, salvage, mop-up.
6.	Sleeping.
7.	Unable to act.
8.	Irrational action.
9.	Not classified above.*
0.	Undetermined or not reported.*

J. - PART OF BODY AFFECTED	
1.	Head, neck.
2.	Body, trunk, back.
3.	Arm.
4.	Leg.
5.	Hand.
6.	Foot.
7.	Internal. Included are respiratory system and heart.
8.	Multiple parts.
9.	Not classified above.*
0.	Undetermined or not reported.*

K. - DISPOSITION OF VICTIM	
1.	Taken to hospital by fire department vehicle.
2.	Taken to hospital by nonfire department vehicle
3.	Taken to other than hospital.
4.	Died.
9.	Not classified above.*
0.	Undetermined or not reported.*

L. - On reverse side
DESCRIBE THE PERTINENT FACTS CAUSING THIS CASUALTY

*Clarify. If more space is needed, use other side by reference to form section

EXHIBIT 2

NEW CFIRS REPORT FORMS

FORM CFIRS 1

FORM CFIRS 2

FORM CFIRS 3

SECTION A	CALIFORNIA FIRE INCIDENT REPORTING SYSTEM										CFIRS 1		
FDID	INCIDENT NUMBER										Year		Exp. No.
CORRECTIONS Change <input type="checkbox"/> Delete <input type="checkbox"/>	Fire Department										MULTI-AGENCY Agency I.D. Year		Incident No.
INCIDENT DATE	DISPATCH TIME		ARRIVAL TIME		END TIME		ADD'L DAYS		FIRST IN COMPANY		DISTRICT		
SITUATION(S) FOUND	#1	#2	#3	#4	AUTOMATIC OR MUTUAL AID		METHOD OF ALARM		TYPE WEATHER		AIR TEMPERATURE		PROPERTY MANAGEMENT
INCIDENT ADDRESS / LOCATION													
ROOM / APARTMENT		ZIP CODE		CENSUS TRACT		FIRE HAZARD BEVERLY ZONE							
TOTAL FIRE SERVICE PERSONNEL RESPONDED			Career		Vol.		NO. APPARATUS RESPONDED		Engine		Truck	Rescue Med.	Other
CODE	NAME: Last, First, M.I.										AREA		TELEPHONE
ADDRESS / CITY											STATE	ZIP	
CODE	NAME: Last, First, M.I.										AREA		TELEPHONE
ADDRESS / CITY											STATE	ZIP	
GENERAL PROPERTY USE		SPECIFIC PROPERTY USE		BUILDING CODE OCCUPANCY TYPE		STRUCTURE TYPE		STRUCTURE STATUS		OCCUPIED AT TIME OF INCIDENT			
FOR MOBILE PROPERTY INVOLVED	Type		Vehicle License No.		State		Year		Make		L.C.C./D.O.T. Permt No.		
Model	Vehicle Identification No.										Drivers' License No.		State

SECTION B	COMPLETE FOR ALL FIRES													
TYPE OF ACTION(S) TAKEN	#1	#2	#3	#4	FIRE ORIGIN Area		Level		Horizontal Distance From		FORM OF HEAT		IGNITION FACTOR	
SEX	AGE	SEX	AGE	MATERIAL FIRST IGNITED		Type		Form		CONTRIBUTING FACTOR(S)		#1	#2	METHOD OF EXTINGUISHMENT
ESTIMATED PROPERTY LOSS		ESTIMATED CONTENTS LOSS		FUEL MODEL		ACRES BURNED								
IF EQUIPMENT INVOLVED IN IGNITION	Type		Model		Year									
Make	Serial No.													

SECTION C	COMPLETE FOR STRUCTURE FIRE												
CONSTRUCTION TYPE		ROOF COVERING		NUMBER OF STORES		EXTENT OF DAMAGE		Flame		Smoke			
MATERIAL GENERATING MOST SMOKE		Type		Form		AVENUE OF SMOKE TRAVEL		DETECTION SYSTEM Type		Power Supply		Performance	Reason For Failure
EXTINGUISHING SYSTEM		Type		Performance		Reason For Failure		SPRINKLER HEAD(S) Type		Number Activated			

SECTION D	COMPLETE FOR FIRE SERVICE CASUALTY AND NON-FIRE SERVICE FIRE CASUALTY										
FIRE SERVICE CASUALTY		Injuries		Fatalities		NON-FIRE SERVICE FIRE CASUALTY		Injuries		Fatalities	

SECTION E	COMPLETE FOR E.M.S.											
NUMBER OF PATIENTS		HIGHEST LEVEL OF CARE CAPABLE OF BEING PROVIDED ON SCENE		Fire		Other		HIGHEST LEVEL OF CARE PROVIDED ON SCENE		Fire		Other
E.M.S. TYPE OF SITUATIONS FOUND	#1	#2	#3	#4	NO. OF PATIENTS TRANSPORTED BY		Fire Dept.		Pvt. Amb.		Coroner	Other

SECTION F	COMPLETE FOR HAZ MAT																		
DES CTRL NUMBER		HAZ MAT RELEASE		Area		Level		RELEASE FACTORS		#1		#2	#3	#4	CONTRIBUTING FACTOR(S)		#1	#2	
EST. NO. CHEMICALS RELEASED		TYPE OF EQUIPMENT INVOLVED IN RELEASE		HAZ MAT ACTION(S) TAKEN		#1		#2		#3		#4		DISPOSITION OF INCIDENT					
HAZ MAT I.D. SOURCES		Personnel	#1	#2	Reference Material		#1	#2	FIRE SERVICE HAZ MAT CASUALTY		Injuries		Fatalities		NON-FIRE SERVICE HAZ MAT CASUALTY		Injuries		Fatalities
CHEMICAL OR TRADE NAME				DOT I.D. NO.		DOT HAZARD CLASS		CAS NO.											
PHYSICAL STATE		Stored	Released	QUANTITY RELEASED		UNIT OF MEASURE		EXTENT OF RELEASE		SUSPECTED ENVIRONMENTAL CONTAMINATION									
CONTAINER		Type	Material	Description Use		Feature	Capacity		UNIT OF MEASURE		ADDITIONAL HAZARDOUS MATERIALS ON BACK								

SECTION G	OTHER ACTION(S) TAKEN				SPECIAL STUDIES: Local												Statewide																																															
TYPE OF ACTION(S) TAKEN	#1	#2	#3	#4	1a			b			c			d			2a			b			c			d			3a			b			c			d			4a			b			c			d			5a			b			c			d		

SECTION F. Continued

CHEMICAL OR TRADE NAME				DOT I.D. NO.	DOT HAZARD CLASS	CAS NO.	SUSPECTED ENVIRONMENTAL CONTAMINATION		
PHYSICAL STATE	Stored	Released	QUANTITY RELEASED	UNIT OF MEASURE	EXTENT OF RELEASE				
CONTAINER	Type	Material	Description Use	Feature	Capacity	UNIT OF MEASURE			
CHEMICAL OR TRADE NAME				DOT I.D. NO.	DOT HAZARD CLASS	CAS NO.	SUSPECTED ENVIRONMENTAL CONTAMINATION		
PHYSICAL STATE	Stored	Released	QUANTITY RELEASED	UNIT OF MEASURE	EXTENT OF RELEASE				
CONTAINER	Type	Material	Description Use	Feature	Capacity	UNIT OF MEASURE			

COMMENTS

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EXHIBIT 3

COMMISSION STAFF'S
SIDE-BY-SIDE ANALYSIS

OLD AND NEW CFIRS REPORT FORM REQUIREMENTS

Hearing Date: February 27, 1997
 File Number: CSM-4419A
 Staff: Steve Zimmerman
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The following table summarizes the data on each of the reporting categories contained in the new CFIRS Manual, shown in the order in which they appear on the CFIRS-1 Incident Report form.

New CFIRS Field Name	Old CFIRS Field Name	SFM Comparison Table (new v. old) shows:	New CFIRS Manual shows new field to be:
Section A			
Fire Dept. ID Number	Fire Dept. ID Number	Same	Same
Incident Number	Incident Number	Same	Same; formerly chronological, now chronological by year.
Exposure Number	Exposure Number	Same	Same. [An exposure fire is defined as a fire in a building, structure or vehicle which results from a fire outside that building, structure or vehicle.]
Correction: Change Delete	Del & Corr	Same	Formerly standalone check boxes; now a single field.
Multi-Agency Incident Number	[none]	Added	Used only for mutual aid type incidents.
Incident Date	Month-Day-Year	Same as	Same data.
Dispatch Time	Time	Same as	Same data. The time when the incident 'occurred' was replaced with the dispatch time.
Arrival Time	[none]	Added, Optional (local use)	Required.
End Time	[none]	Added, Optional (local use)	Required.
Additional Days	[none]	Added	Used only if the fire lasts more than one calendar day.

First In Company	[none]	Added, Optional (local use)	Local option.
District	District/City	Same as, Optional (local use)	Local option.
Situations Found (up to 4)	Type of Incident	Same as	Same data; however, the number of possible situations (together with the codes for them) has expanded.
Automatic or Mutual Aid	Out of Jurisdiction	Same as	Formerly optional. Now, used to record whether mutual aid was given or received.
Method of Alarm	Alarm Source	Same as	Formerly an optional, check-box entry. Now entered with a code.
Type of Weather	[none]	Added, Optional (local use)	Required except when giving mutual aid.
Air Temperature	[none]	Added, Optional (local use)	Required except when giving mutual aid.
Property Management	Property Management	Same	Same; formerly check box, now code entry.
Incident Address / Location; Room / Apartment; ZIP Code	Incident Address	Same, Optional (local use)	Local option.
Census Tract	Census / Parcel Number	Same as	Formerly optional. Not required when giving mutual aid to another department.
Fire Hazard Severity Zone	[none]	Added, Optional	Required except when giving mutual aid.
Total Fire Service Personnel responded - career	[none]	Added, Optional (local use)	Leave blank for exposure reports.

Total Fire Service Personnel responded - volunteer	[none]	Added, Optional (local use)	Leave blank for exposure reports.
Number of Apparatus Responded - Engine	[none]	Added, Optional (local use)	Leave blank for exposure reports.
Number of Apparatus Responded - Truck	[none]	Added, Optional (local use)	Leave blank for exposure reports.
Number of Apparatus Responded - Rescue Med.	[none]	Added, Optional (local use)	Leave blank for exposure reports.
Number of Apparatus Responded - Other	[none]	Added, Optional (local use)	Leave blank for exposure reports.
Involvement Code; Name; Area; Telephone; Address/City; State; ZIP	Occupant Name; Relationship; Address; Room/Apt. No.; City; ZIP; Telephone No. (Callback)	Same as, Optional (local use)	Local option.
Involvement Code; Name; Area; Telephone; Address/City; State; ZIP	Owner Name; Address; City; ZIP	Same as, Optional (local use)	Local option.
[none]	Manager Name; Address; City; ZIP; Telephone No.	Deleted	Was optional.
[none]	Day Code	Deleted	Deleted

[none]	County of Fire	Deleted	Deleted
General Property Use	Property Class - Complex	Same as	Same data. The number of codes has increased.
Specific Property Use	Property Class - Individual	Same as	Same data.
Building Code Occupancy Type	[none]	Added	Used only if a building is involved in the fire. Not required when giving mutual aid.
Structure Type	Property Type	Same as	Same data.
Structure Status	[none]	Added	Used only if a building is involved in the fire. Not required when giving mutual aid.
Occupied at Time of Incident	[none]	Added	Used only if a building or vehicle is involved in the fire. Not required when giving mutual aid.
Mobile Property Type	Vehicle Property Type	Same as	Formerly coded in two fields - Vehicle Property Type and Individual Mobile Property Use Classification.
Mobile Property - Vehicle License Number & State, Year, Make, Model	[none]	Added, Optional. These are identified in the SFM response as optional for CFIRS but required on the Office of Emergency Services hazardous materials incident report.	Required (if applicable) when mobile property is involved in an incident. Not required when giving mutual aid to another department.

Mobile Property - ICC/DOT Permit Number, Vehicle ID Number, Driver's License Number & State	[none]	Added, Optional. These are identified in the SFM response as optional for CFIRS but required on the Office of Emergency Services hazardous materials incident report.	Required (if applicable) when mobile property is involved in an incident. Not required when giving mutual aid to another department.
[none]	Construction Date (Mobile Home)	Deleted	Required except when giving mutual aid. Field is "Year" in Section B.
Section B			
Type of Actions Taken (up to 4)	[none]	Added	This field contains up to 4 two-digit codes which describe the actions taken by the fire department to put out the fire or deal with the incident. Applies only to fires - not haz mat or other incident. Data for haz mat goes in Section F, and for non-fire and non-haz mat in Section G.
Fire Origin - Area	Area of Origin	Same as	Same data.
Fire Origin - Level	Level of Origin	Same	Same
Fire Origin Horizontal Distance From	[none]	Added, Optional	Required <u>only</u> if Area of Origin is coded 91 or 92, otherwise leave blank.
Form of Heat of Ignition	Form of Heat of Ignition	Same	Same
Ignition Factor	Act or Omission Causing Ignition Act or Omission Causing Spread	Same as	Two data elements became one. Reduction: one data element.

Sex/Age of Person Involved in ignition (2 each)	[none]	Added, Optional	Required only if a person is involved in the ignition, otherwise leave blank.
Material Ignited First - Type	Material Ignited First - Type	Same	Same
Material Ignited First - Form	Material Ignited First - Form	Same	Same
Contributing Factors	Main Avenue Fire Spread Material Causing Spread - Type Material Causing Spread - Form	Same as	Three data elements became one. Reduction: two data elements.
Method of Extinguishment	[none]	Added	Required.
Estimate Property Loss	Estimate Loss - Property	Same	Same, but need for update reports is stressed.
Estimated Contents Loss	Estimated Loss - Contents	Same	Same, but need for update reports is stressed.
Fuel Model	[none]	Added, Optional	Required for vegetation fires only.
Acres Burned	[none]	Added	Applies only to vegetation fires.
Equipment Involved in Ignition - Type	Source of Heat Causing Ignition	Same as	Same data.
Equipment Involved in Ignition - Make	[none]	Added, Optional	Required (if applicable) except when giving mutual aid.
Equipment Involved in Ignition - Model	[none]	Added, Optional	Required (if applicable) except when giving mutual aid.

Equipment Involved in Ignition - Year	[none]	Added, Optional	Required (if applicable) except when giving mutual aid.
Equipment Involved in Ignition - Serial Number	[none]	Added, Optional	Required (if applicable) except when giving mutual aid.
Section C			
Construction Type Roof Covering	Construction Type - Exterior Wall Interior Wall Floor/Roof Fire Rated	Same as	Four data elements became two. Reduction: two data elements.
Number of Stories	Number of Stories	Same	Same, for structure fires only.
Extent of Damage - Flame	Extent of Damage - Fire	Same as	Same data.
Extent of Damage - Smoke	Extent of Damage - Smoke	Same	Same
[none]	Extent of Damage - Water	Deleted	Deleted
Material Generating Most Smoke - Type	[none]	Added, Optional	Required for structure fires only.
Material Generating Most Smoke - Form	[none]	Added, Optional	Required for structure fires only.
Main Avenue of Smoke Travel	Main Avenue of Smoke Spread	Same as	Same data.

Detection System Type	Signal or Warning System - Type Means of Activation Type Detectors	Same as	Three data elements became one. Reduction: two data elements.
Detection System Power Supply	[none]	Added	Overlaps former field "Signal or Warning System Type". If no detection system present, leave blank.
Detection System Performance	Signal or Warning System Effectiveness	Same as	Same data.
Detection System Reason for Failure	[none]	Added	Overlaps former field "Signal or Warning System Effectiveness". Applies only if a detection system is present and fails to operate. If no detection system present, leave blank.
Extinguishing System Type	Sprinklers - Type Standpipes - Type Special Hazard Protection - Type	Same as	Three data elements became one. Reduction: two data elements.

Extinguishing System Performance	Sprinklers Effectiveness Standpipes Effectiveness Portable Extinguishers Effectiveness Special Hazard Protection Effectiveness	Same as	Four data elements became one. Reduction: three data elements.
Extinguishing System Reason for Failure	[none]	Added	Overlaps former fields on effectiveness of sprinklers, standpipes, and special hazard protection. If no extinguishing system present, leave blank.
Sprinkler Heads - Type	[none]	Added	Overlaps former field "Sprinklers - Type". If no sprinkler system present, leave blank.
Sprinkler Heads - Number Activated	[none]	Added	Overlaps former field "Sprinklers - Effectiveness" If no sprinkler system present, leave blank. If system was present but no heads activated, enter 000.
[none]	Portable Extinguishers - Type	Deleted	Deleted
[none]	Private Brigade - Type	Deleted	Deleted
[none]	Private Brigade - Effectiveness	Deleted	Deleted
[none]	Watchman Effectiveness	Deleted	Deleted
[none]	Other Facilities Effectiveness	Deleted	Can be reported as "Undetermined" sprinkler system "Performance".

Section D			
Fire Service Casualty - Injuries	Firefighter - Number Injured	Same as	Same data.
Fire Service Casualty - Fatalities	Firefighter - Number of Deaths	Same as	Same data.
Non-Fire Service Casualty - Injuries	Civilians - Number Injured	Same as	Same data.
Non-Fire Service Casualty - Fatalities	Civilians - Number of Deaths	Same as	Same data.
Section E: Emergency Medical Service Incidents			[Optional per H & S Code § 13110.5, as amended by Ch. 345/87] Required for each incident in which the Situation Found is coded 31-32 and 35-39. Record "Type of Action Taken" in Section G. Not required when giving Mutual Aid to another department.
Number of Patients	[none]	[Not in SFM Table]	
Highest Level of Care Capable of Being Provided - Fire	[none]	[Not in SFM Table]	
Highest Level of Care Capable of Being Provided - Other	[none]	[Not in SFM Table]	
Highest Level of Care Being Provided - Fire	[none]	[Not in SFM Table]	

Highest Level of Care Being Provided - Other	[none]	[Not in SFM Table]	
EMS Situations Found (up to 4)	[none]	[Not in SFM Table]	
Number of Patients Transported by Fire Dept.	[none]	[Not in SFM Table]	
Number of Patients Transported by Pvt. Amb.	[none]	[Not in SFM Table]	
Number of Patients Transported by Coroner	[none]	[Not in SFM Table]	
Number of Patients Transported by Other	[none]	[Not in SFM Table]	
Section F: Hazardous Materials Incidents			[Optional per H & S Code § 13110.5, as amended by Ch. 345/87] Required for each incident in which the Situation Found is coded 41 to 43. Not required when giving Mutual Aid. Enter "Type of Actions Taken" in Section G.
OES Control Number	[none]	[Not in SFM Table]	
Haz Mat Release - Area	[none]	[Not in SFM Table]	
Haz Mat Release - Level	[none]	[Not in SFM Table]	
Release Factors (up to 4)	[none]	[Not in SFM Table]	

Contributing Factors (up to 2)	[none]	[Not in SFM Table]	
Estimated Number of Chemicals Released	[none]	[Not in SFM Table]	
Type of Equipment Involved in Release	[none]	[Not in SFM Table]	
Haz Mat Actions Taken (up to 4)	[none]	[Not in SFM Table]	
Disposition of Incident	[none]	[Not in SFM Table]	
Haz Mat ID Sources - Personnel	[none]	[Not in SFM Table]	
Haz Mat ID Sources - Reference Material	[none]	[Not in SFM Table]	
Fire Service Haz Mat Casualty - Injuries	[none]	[Not in SFM Table]	
Fire Service Haz Mat Casualty - Fatalities	[none]	[Not in SFM Table]	
Non-Fire Service Haz Mat Casualty - Injuries	[none]	[Not in SFM Table]	
Non-Fire Service Haz Mat Casualty - Fatalities	[none]	[Not in SFM Table]	
Chemical or Trade Name	[none]	[Not in SFM Table]	

DOT ID Number	[none]	[Not in SFM Table]	
DOT Hazard Class	[none]	[Not in SFM Table]	
CAS Number	[none]	[Not in SFM Table]	
Physical State - Stored	[none]	[Not in SFM Table]	
Physical State - Released	[none]	[Not in SFM Table]	
Quantity Released	[none]	[Not in SFM Table]	
Unit of Measure	[none]	[Not in SFM Table]	
Extent of Release	[none]	[Not in SFM Table]	
Suspected Environmental Contamination	[none]	[Not in SFM Table]	
Container - Type	[none]	[Not in SFM Table]	
Container - Material	[none]	[Not in SFM Table]	
Container - Description use	[none]	[Not in SFM Table]	
Container - Feature	[none]	[Not in SFM Table]	
Container - Capacity	[none]	[Not in SFM Table]	
Unit of Measure	[none]	[Not in SFM Table]	
Section G:			
Other Actions Taken	[none]	[Not in SFM Table]	This field contains up to 4 two-digit codes which describe the actions taken by the fire department to put out the fire or deal with the incident. Also used when giving Mutual Aid.

Special Studies - local	[none]	[Not in SFM Table]	The local special studies field is used to code information for local special studies, if any are being done. The use of this field is a local option.
Special Studies - Statewide	[none]	[Not in SFM Table]	The statewide special studies field is used to code information for statewide special studies. Staff notes that no statewide special studies are alleged by claimant at this time.

The following table summarizes the data on each of the reporting categories contained in the new CFIRS Manual, shown in the order in which they appear on the CFIRS-2 Fire Service Casualty Report form.

New CFIRS Field Name	Old CFIRS Field Name	SFM Comparison Table (new v. old) shows:	New CFIRS Manual shows new field to be:
Section A			
Fire Dept. ID Number	Fire Dept. ID Number	[Not in SFM Table]	Same as CFIRS-1 for this incident.
Incident Number	Incident Number	[Not in SFM Table]	Same as CFIRS-1 for this incident.
Correction: Change Delete	Del & Corr	[Not in SFM Table]	Same as CFIRS-1 for this incident.
Multi-Agency Incident Number	[none]	[Not in SFM Table]	Same as CFIRS-1 for this incident. Used only for mutual aid type incidents.

Incident Address / Location; Room / Apartment; ZIP Code	Incident Address	[Not in SFM Table]	Same as CFIRS-1 for this incident. Not optional on the casualty report. Note that a fire service injury which happens en route to a fire should be reported as occurring at the actual location rather than the fire incident location.
County if different	[none]	[Not in SFM Table]	Used if the casualty occurs outside the county in which the employee usually works.
Incident Date	Month-Day-Year	[Not in SFM Table]	Same as CFIRS-1 for this incident.
Dispatch Time	Time of Injury	[Not in SFM Table]	Same as CFIRS-1 for this incident.
Section B			
Casualty Number	Victim Number	[Not in SFM Table]	Same
Sex	Sex	[Not in SFM Table]	Same
Date of Birth	[none]	[Not in SFM Table]	Required
Age	Age	[Not in SFM Table]	Same
Service Date	[none]	[Not in SFM Table]	Required. (From personnel records.)
Name (Last, First, MI)	Name (Last, First, MI)	[Not in SFM Table]	Same
Area; Telephone	Telephone	[Not in SFM Table]	Local option.
Address/City; State; ZIP	City or Town of Residence	[Not in SFM Table]	Local option.
Social Security Number	[none]	[Not in SFM Table]	Local option.
Employee Status	Affiliation	[Not in SFM Table]	Same
Employee Assignment	[none]	[Not in SFM Table]	Required

Casualty Date	[none]	[Not in SFM Table]	May differ from the incident date.
Casualty Time	[none]	[Not in SFM Table]	Will differ from dispatch time.
Severity	Severity	[Not in SFM Table]	Was formerly a check box for injury or death.
Primary Symptom	Nature of Casualty	[Not in SFM Table]	Same
Secondary Symptom	Nature of Casualty	[Not in SFM Table]	Same
Parts of Body Affected (up to 4)	Part of Body Affected	[Not in SFM Table]	Same
Activity at Time of Casualty	Activity at Time of Casualty	[Not in SFM Table]	Same
Where Casualty Occurred	[none]	[Not in SFM Table]	Required; to differentiate en-route casualties from fire scene casualties.
Cause of Casualty	Cause of Casualty	[Not in SFM Table]	Same
Medical Care Provided	[none]	[Not in SFM Table]	Required
Disposition of Casualty	Disposition of Victim	[Not in SFM Table]	Same
Contributing Equipment: Used (up to 3)	[none]	[Not in SFM Table]	Required
Contributing Equipment: Status (up to 3)	[none]	[Not in SFM Table]	Required
Contributing Equipment: Performance (up to 3)	[none]	[Not in SFM Table]	Required

Comments	Summary	[Not in SFM Table]	Local option. (Formerly, departments were required to "Describe How Casualty Occurred".)
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The following table summarizes the data on each of the reporting categories contained in the new CFIRS Manual, shown in the order in which they appear on the CFIRS-3 Non-Fire Service Casualty Report form.

New CFIRS Field Name	Old CFIRS Field Name	SFM Comparison Table (new v. old) shows:	New CFIRS Manual shows new field to be:
Section A			
Fire Dept. ID Number	Fire Dept. ID Number	[Not in SFM Table]	Same as CFIRS-1 for this incident.
Incident Number	Incident Number	[Not in SFM Table]	Same as CFIRS-1 for this incident.
Correction: Change Delete	Del & Corr	[Not in SFM Table]	Same as CFIRS-1 for this incident.
Multi-Agency Incident Number	[none]	[Not in SFM Table]	Same as CFIRS-1 for this incident. Used only for mutual aid type incidents.
Incident Address / Location; Room / Apartment; ZIP Code	Incident Address	[Not in SFM Table]	Same as CFIRS-1 for this incident. Not optional on the casualty report.
Incident Date	Month-Day-Year	[Not in SFM Table]	Same as CFIRS-1 for this incident.
Dispatch Time	Time	[Not in SFM Table]	Same as CFIRS-1 for this incident.
Section B			
Casualty Number	Victim Number	[Not in SFM Table]	Same
Sex	Sex	[Not in SFM Table]	Same
Date of Birth	[none]	[Not in SFM Table]	Required

Age	Age	[Not in SFM Table]	Same
Involvement Code	[none]	[Not in SFM Table]	Local option.
Name (Last, First, MI)	Name (Last, First, MI)	[Not in SFM Table]	Same
Area; Telephone	Telephone	[Not in SFM Table]	Local option.
Address/City; State; ZIP	City or Town of Residence	[Not in SFM Table]	Local option.
Casualty Date	[none]	[Not in SFM Table]	May differ from the incident date.
Casualty Time	[none]	[Not in SFM Table]	Will differ from dispatch time.
Severity	[none]	[Not in SFM Table]	Required
Affiliation	Affiliation	[Not in SFM Table]	Same
Familiarity with Structure	Familiarity of Victim with Structure	[Not in SFM Table]	Same
Location of Casualty at Time of Ignition	Location of Victim at Time of Ignition	[Not in SFM Table]	Same
Condition Before Casualty	Condition Before Injury	[Not in SFM Table]	Same
Condition Preventing Escape	Condition Preventing Victim's Escape	[Not in SFM Table]	Same
Activity at Time of Casualty	Activity at Time of Casualty	[Not in SFM Table]	Same
Cause of Casualty	Cause of Casualty	[Not in SFM Table]	Same
Apparent Symptom	Nature of Casualty	[Not in SFM Table]	Same
Parts of Body Affected (up to 4)	Part of Body Affected	[Not in SFM Table]	Same
Disposition of Casualty	Disposition of Victim	[Not in SFM Table]	Same

Comments	Summary	[Not in SFM Table]	Local option. (Formerly, departments were required to "Describe How Casualty Occurred".)
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CSM-4419A

Claim of City of Newport Beach

Chapter 758, Statutes of 1972
Health & Safety Code 13110.5
California Fire Incidence Reporting System
New CFIRS Manual--Version 1.0 July, 1990

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