

9. Matters referred from the Fire Fighter Advisory Committee (FFAC), including but not limited to:
  - D. Discussion and possible action on recommendations from the Curriculum and Testing Committee.

**PLEASE NOTE:** The curriculum and testing committee will bring forward two documents for the commission's review. Due to the size of these files we have not included them in the meeting notebook, but have published them as separate items:

[Basic Fire Suppression curriculum](#)  
[Hazardous Materials curriculum](#)



**CITY OF SAN ANTONIO**  
**San Antonio Fire Department**

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March 23, 2010

Mr. Gary L. Warren  
 Executive Director  
 Texas Commission on Fire Protection  
 P.O. Box 2286  
 Austin, Texas 78768-2286

Mr. Warren,

I would like to take this opportunity to comment on the proposed changes to Chapter One, Basic Fire Suppression Curriculum in relation to NFPA 1001 Standard for Fire Fighter Professional Qualifications, 2008 Edition. As I understand the situation, the TCFP is proposing to update Chapter 1 to more closely reflect the current edition of NFPA 1001. I have been informed that, as part of this process, the Commission is considering increasing the recommended hours for the Basic Fire Suppression Curriculum from the current 468 hours to 538 hours, which includes an increase of 24 hours in Hazardous Materials alone.

While I support the update of the curriculum, the fiscal impact of increasing hours is of grave concern to me. An increase of 70 hours would necessitate adding 2 weeks to our cadet program, which is already 25 weeks long. Under current obligations, the department would not only have to pay 2 weeks of additional salary to the cadets, but would have to continue to backfill positions in the field which would remain vacant as a result. The addition of 2 weeks to our academy is projected to cost \$633,857 annually. This amount is in addition to the \$24,000 annual increase in expenditures incurred as a result of the recent changes in TCFP mandated fees for testing, certification and required criminal history checks.

The nationwide economic downturn has caused numerous fire departments to stop hiring, and, in many cases, layoff employees. While the City of San Antonio has fared better than most of the country, we have not been unaffected by the economic conditions. At this time, the City is projecting a budget deficit of \$67.5 million for fiscal year 2011. The city manager of San Antonio has directed all departments to submit budget reductions for the coming year. The Fire Department has been ordered to cut \$11 million

from our FY 2011 budget. As one can easily see from the aforementioned figures, the San Antonio Fire Department can simply not afford an unfunded mandate of this size.

Finally, while I understand that these changes will be in the form of "Recommendations" and some may assert that we are not forced to comply with the changes, I believe that any responsible agency will need to carefully consider the risks of ignoring them. Noncompliance will put any agency in a compromised position should their training records come under scrutiny in the course of any legal action against a department where trainable actions are in question.

I would ask that the Commission carefully consider any and all changes made to curricula with respect to what it would cost for municipalities to comply. Thank you for your consideration.

Sincerely,



Noel Horan  
Executive Officer/ Assistant Chief  
San Antonio Fire Department

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