



CITY OF ATTLEBORO, MASSACHUSETTS
HEADQUARTERS OF THE FIRE DEPARTMENT

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FIRE CHIEF

April 22, 2014

Honorable Mayor Kevin J. Dumas
Government Center, City Hall
77 Park Street
Attleboro, MA 02703

RE: Reorganization of the Fire Department

Dear Mayor Dumas,

During the last two years, we have worked diligently to develop a reorganizational plan for the fire department. The proposed reorganizational plan addresses important firefighter safety issues; enhances service delivery; improves compliance with national fire protection association (NFPA) standards; improves fire code enforcement and fire prevention capabilities; reduces community risk of injury and major fire loss; and reduces potential liability for the City of Attleboro. Because the plan provides an expandable management structure, the fire department will be better prepared to meet the future needs of the community.

The proposed plan improves compliance with NFPA 1710, ***Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2010 Edition***. This is the nationally recognized standard for fire department staffing and deployment.

Key components of the proposed plan include:

- Addition of an Assistant Fire Chief (Deputy, non-union)
- Utilization of District Chiefs as Platoon Commanders and Administrative Division Chiefs (Deputy Chiefs will be phased out through attrition)
- Reduction in the number of Captains (through attrition, number will be decreased to 8)
- Addition of Lieutenants as first-level supervisors (number of Lieutenants will reach 16 as Captains retire)
- Improved staffing on Engine-4 and Ladder-1 (presently operate with 2 firefighters)
- Assignment of a company officer to each primary fire apparatus
- Addition of one (1) fire inspector

Recognizing economic limitations, we have developed an updated fee schedule for fire prevention activities and have proposed a new cost recovery program. The cost recovery program allows the fire department to recover costs associated with hazardous material incident assessment and mitigation in accordance with M.G.L. Chapter 21E, ***the Massachusetts Oil and Hazardous Material Release Prevention and Response Act***. The proposed fee schedules will provide recurring revenue necessary to fund the proposed reorganizational plan.

As you know, the Attleboro Professional Firefighters, Local 848 have recently ratified the proposed reorganizational plan following twelve months of negotiation and impact bargaining. Therefore, I respectfully request that you submit the proposed fire department reorganizational plan, fire prevention fee schedule, and cost recovery program to the Municipal Council to implement the necessary modifications to existing City ordinances.

Sincerely,

A handwritten signature in cursive script, reading "Scott T. Lachance".

Scott T. Lachance
Fire Chief

Attleboro Fire Department

Reorganization Plan

4/22/2014

Scott T. Lachance, Fire Chief

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Attleboro Fire Department (AFD) Rank Structure Analysis

1 Introduction

The current structure of the Attleboro Fire Department is discussed in the following sections. The purpose of this document is to identify deficiencies within the rank structure and identify potential solutions while recognizing budgetary constraints. The deficiencies discussed have been identified from several sources including other fire departments in Bristol County, Norfolk County, and bordering Rhode Island communities; the National Incident Management System (NIMS) Incident Command System (ICS); National Fire Protection Agency (NFPA) technical consensus standards; and the text book *Managing Fire and Rescue Services*.

Currently, the fire department is structured as shown in figure 1. The Fire Chief directly supervises eleven different people. The amount of administrative oversight required to effectively manage a department with 87 employees requires additional managerial staff to ensure long-term strategic planning, efficient mission implementation, development of sufficient institutional memory, and management of normal day-to-day activities.

In order to ensure a fundamental understanding of the operation of the fire department, the following sections discuss common rank structures found in the United States Fire Service. Additionally, the current Attleboro Fire Department rank structure is reviewed and identified deficiencies within the current structure are discussed. The final section of this document presents a recommended restructured rank plan along with an implementation plan.

2 National Standards, Regulations, and Other Factors

There are numerous standards, regulations, and other requirements that affect deployment of firefighting personnel and resources:

2.1 NIOSH

The National Institute for Occupational Safety and Health (NIOSH) investigates every firefighter fatality and establishes national standards for firefighter safety and health. Municipalities are likely to have some liability if Fire Departments do not work towards meeting these national standards.

The two-in-two-out standard is probably the most important standard of NIOSH. The standard mandates that whenever firefighters are engaged in structural firefighting, at least two firefighters must be outside and available to facilitate a rescue in the event that the firefighters encounter problems. Firefighters are not allowed to enter these atmospheres without immediate assistance available unless a life is clearly at risk.

2.2 OSHA

The Federal Occupational Safety and Health Agency (OSHA) regulates employment in Immediately Dangerous to Life and Health (IDLH) atmospheres. Structural firefighting is considered an IDLH atmosphere and is therefore subject to federal OSHA requirements including the two-in-two-out requirement discussed under NIOSH.

Although Massachusetts municipal employees are not directly covered by OSHA, the municipality is still required to comply with recognized safety regulations. The following text is from the Massachusetts Department of Labor and Workforce Development:

“More than half the states in the US cover their public sector workers, such as firefighters, with OSHA standards or equivalent. In Massachusetts, although public sector workers are not specifically covered by OSHA, the Massachusetts Division of Occupational Safety (DOS) can set standards for municipal worker occupational health under MGL Chapter 149 section 6. It is the policy of the Division of Occupational Safety that in order to meet the intent of Chapter 149 section 6, municipalities should comply with OSHA standards such as the Respirator Standard.

In addition, according to Massachusetts General Law Chapter 48 Section 51A, breathing apparatus must meet NFPA standards set for SCBAs. (According to legal counsel at the State Fire Academy, this would include the requirement for fit testing respirators.)”¹

Workplace safety for Massachusetts municipal employees is regulated by Massachusetts General Law Chapter 149, Section 6. According to the Massachusetts Department of Labor and Workforce Development, “Municipal employers who comply with US Department of Labor OSHA and other nationally recognized safety and health standards will be considered to be in compliance with Chapter 149, Section 6”.²

2.3 NFPA

The National Fire Protection Association (NFPA) is the national standard for all fire protection issues. Even in jurisdictions that have not formally adopted specific NFPA standards, there is significant liability if a municipality deviates significantly and a problem occurs as a result of this deviation. NFPA is considered a technical consensus standard. There are multitudes of case law and successful litigation against municipalities for failing to meet standards when an injury has occurred.

Some of the more important standards set forth by NFPA involve response times, total staffing levels, Company size, RIT establishment, apparatus age, and training. NFPA has established the minimum recommended staffing levels for Engine Companies and Ladder Companies as 3 firefighters and 1 Company Officer. All modern Fire Departments work diligently to improve compliance with NFPA standards while recognizing financial constraints.

NFPA standards have become the nationally recognized standard for all aspects of the fire service.

2.4 ISO

The Insurance Services Organization maintains an ISO rating for all communities in the United States. Most insurance carriers utilize this rating to determine property insurance premiums. The ISO rating is an extensive computation that considers all aspects of a community's fire protection capability. ISO utilizes

¹ *Labor and Workforce Development, Respirator Fit Testing for Firefighters*, Retrieved April 18, 2014 from <http://www.mass.gov/lwd/labor-standards/massachusetts-workplace-safety-and-health-program/hazard-info/406-respirator-fit-testing-for-firefighters.html>

² *Labor and Workforce Development, Massachusetts Workplace Safety and Health Program*, Retrieved April 18, 2014 from <http://www.mass.gov/lwd/labor-standards/massachusetts-workplace-safety-and-health-program/>

NFPA standards in their calculations. ISO is discussed later in this document.

3 Common Rank/Structure Implementations

3.1 Operational / Line Positions

3.1.1 Company Officers

The term company officer typically refers to Lieutenants or Captains. Most fire departments have *both* Lieutenants and Captains; however, *the Attleboro Fire Department utilizes only Captains*. The rank of Lieutenant is the first rank above firefighter. The rank of Captain is the next rank above Lieutenant.

There are numerous variations in the use of Lieutenants/Captains. Generally speaking, the company officer is responsible for a crew (called a company in the fire service) and the apparatus they are assigned to. The company officer has the following responsibilities:

- Supervising the company
- Ensuring safe operation of equipment
- Providing training for the company
- Ensuring company compliance with departmental policies, procedures, & SOGs
- Maintaining safety of the company
- Maintaining morale of the company
- Counseling company members
- Supervising company inspections
- Assisting with administrative duties as directed by the District Chief, Chief, or Assistant Chief

Company officers report directly to a superior officer. The reporting relationship depends on the size of the department. As a general rule, the company officer reports to a superior officer at the next highest rank. This reporting structure is referred to as the “chain of command”. Department issues are managed at the lowest level possible.

3.1.2 Station Officer

The term “station officer” (also called house captain) typically refers to Captains. The station officer typically functions in a fire station that houses multiple fire companies (e.g. the station has 1 Ladder, 1 Engine, and 1 Rescue). Most fire departments have *both* Lieutenants and Captains; however, *the Attleboro Fire Department utilizes only Captains*.

The station officer has the same responsibilities as other company officers and also other additional responsibilities related to supervising other company officers. The station officer has the following responsibilities:

- Supervising their company
- Supervising other company officers in the same fire house
- Ensuring safe operation of equipment
- Providing training for their company and other company officers
- Ensuring company compliance with departmental policies, procedures, & SOGs
- Maintaining safety of their company
- Maintaining morale of their company

- Counseling members of their company
- Supervising company inspections
- Assisting with administrative duties as directed by the District Chief, Chief, or Assistant Chief

3.1.3 District Chiefs

3.1.3.1 Platoon District Chiefs

The term District Chief typically refers to the first rank above Captain. Generally speaking, the District Chief is responsible for a group of fire stations and the companies assigned to them during an entire work shift. This work shift is referred to a “tour”. This group of fire stations and companies is called a “district”. There can be more than one district for each tour in larger departments. These District Chiefs would each be responsible for 3 – 4 Fire Stations and their respective companies. They would be referred to as Platoon District Chiefs.

The Platoon District Chief has the following responsibilities:

- Supervising the company officers
- Ensuring safe operation of equipment
- Providing training for the company officers and district/platoon members
- Ensuring company officer compliance with departmental policies, procedures, & SOGs
- Maintaining safety of the district/platoon
- Maintaining morale of the district/platoon
- Counseling company officers
- Assisting with administrative duties as directed by the Assistant Chief or Chief

3.1.3.2 Administrative District Chiefs

The rank of District Chief is also commonly utilized for administrative positions, although there are still operational responsibilities of these administrative positions. It is common to find District Chiefs in the following administrative (Monday – Friday) positions:

- Fire Prevention Bureau Chief
- EMS Chief
- Services Chief (apparatus maintenance, station maintenance, equipment maintenance, communications)
- Training Division Chief

Additionally, Administrative District Chiefs may assist with other administrative duties as directed by the Assistant Chief or Chief. Administrative District Chiefs are assigned to a response vehicle (typically an SUV). They respond as needed to all significant incidents in their response area (i.e. their “district”). At incident scenes, District Chiefs function as critical Command Staff personnel and support the Incident Commander in a various capacities, such as:

- ***Incident Safety Officer*** (mandated at all Hazardous Material incidents and incidents with Immediately Dangerous to Life or Health (IDLH) atmospheres such as found during structural firefighting. This is a mandatory position based on standards set by the Occupational Safety & Health Agency (OSHA) and the National Institute for Occupational Safety and Health (NIOSH).
- ***Accountability Officer*** responsible for maintaining accurate tracking of the location of all personnel operating at the incident scene.

- **Information Officer** responsible for obtaining, recording, and tracking relevant information at large-scale incidents and providing this information to the Incident Commander.
- **Liaison Officer** responsible for interfacing with other agencies and/or departments at large-scale incidents and providing this information to the Incident Commander.
- **Public Information Officer** responsible for preparing information for release to the media, public, and other officials and for delivering brief reports to media as directed by the Incident Commander.
- **Operational Positions** such as Division Leaders, Section Chiefs, or Unit Leaders as directed by the Incident Commander to assist in incident mitigation based on strategies and tactics established by the Incident Commander.

The Attleboro Fire Department does not currently utilize District Chiefs. The position is filled by the rank of Deputy Chief.

3.1.4 Deputy Chiefs

The term Deputy Chief typically refers to the first rank above District Chief. Deputy Chiefs are the highest rank in most fire departments excluding the Fire Chief. In most departments, Deputy Chiefs work an administrative schedule (Monday – Friday) and have both administrative and operational responsibilities. In almost all fire departments, the Deputy Chief is recognized as the Assistant Chief. The Deputy Chief has the following responsibilities:

- Supervising, District Chiefs or Captains (when Captains function as platoon commanders)
- Assisting the Chief with long range planning and goal establishment
- Assisting the Chief with development, implementation, and compliance with all departmental policies, procedures, and directives
- Assisting with the development, implementation, and oversight of the fire department budget
- Responding to incidents as necessary and assuming any required position(s)
- Providing coverage as needed in the absence of the Fire Chief
- Ensuring safe operation of equipment
- Providing training for District Chiefs
- Ensuring company officer compliance with departmental policies, procedures, & SOGs
- Maintaining safety of the department
- Maintaining morale of the department
- Counseling District Chiefs
- Assisting with other administrative duties as directed by the Fire Chief

Deputy Chiefs are assigned to a response vehicle (typically an SUV). They respond to all significant incidents in their response area as needed. At incident scenes, Deputy Chiefs function as the Incident Commanders and direct the actions of the Companies under their command. Their directions are delivered as command orders to company officers and District Chiefs.

The Attleboro Fire Department does utilize Deputy Chiefs; however, Deputy Chiefs in the Attleboro Fire Department function as District Chiefs/Platoon Commanders and work the same schedule as other operational personnel. The department currently has four (4) Deputy Chiefs (one assigned to each of the four shifts) who supervise the company officers under their command.

The current structure of the department results in four “unique” shifts. The Deputy Chiefs do not report to anyone other than the Fire Chief. It is exceedingly difficult for one person (the Fire Chief) to effectively

manage the Deputy Chiefs since they are all assigned to different shifts. Because of numerous other responsibilities, it is not uncommon for the Chief to interact with some of the Deputies only 4 or 5 times in a month.

3.1.5 Assistant Fire Chief (Deputy, non-union)

The term Assistant Chief typically refers to the first rank below the Fire Chief. Assistant Chiefs follow the administrative schedule (Monday – Friday). They have both administrative and operational responsibilities. *Massachusetts Civil Service does not normally recognize this rank. In almost all Civil Service Fire Departments, the position of Assistant Chief is filled by the rank of Deputy Chief.*

As previously discussed, the Attleboro Fire Department presently has four (4) Deputy Chiefs performing the duties of District Chiefs.

The Assistant Chief has the following responsibilities:

- Supervising District Chiefs
- Assisting the Chief with long range planning and goal establishment
- Assisting the Chief with development, implementation, and compliance with all departmental policies, procedures, and directives
- Assisting with the development, implementation, and oversight of the fire department budget
- Responding to incidents as necessary and assuming any required position(s)
- Providing coverage as needed in the absence of the Fire Chief
- Ensuring safe operation of equipment
- Providing training for District Chiefs
- Ensuring compliance with departmental policies, procedures, & SOGs
- Maintaining safety of the department
- Maintaining morale of the department
- Counseling District Chiefs
- Assisting with other administrative duties as directed by the Fire Chief

Assistant Chiefs are assigned to a response vehicle (typically an SUV). They respond to all significant incidents in their response area as needed. At incident scenes, Assistant Chiefs function as the Incident Commanders and direct the actions of the companies under their command. Their directions are delivered as command orders to company officers and District Chiefs.

The Attleboro Fire Department does not currently utilize an Assistant Chief.

3.2 Other Staff Positions

It is very common to find other administrative/staff assignments within the fire service. Some of these positions are discussed in the following sections. This is not intended to be an all inclusive list. Refer to figure 5 for an administrative staffing comparison of several departments. As demonstrated in figure 5, the Attleboro Fire Department is clearly under staffed in this area. This has been a major obstacle in the performance of numerous important daily activities. The current administrative staffing levels have adversely impacted fire prevention, safety, training, public education, and apparatus maintenance.

3.2.1 Fire Prevention Officer/Inspector

This officer is responsible for most fire department inspections, building plan review, fire sprinkler system plan review, and compliance with MGL Chapter 148 and CMR 527 Fire Prevention Regulations. Because of the tremendous workload and potential liability of these requirements, most departments have at least two (2) inspectors performing these duties. There are at least 800 – 1,000 businesses that the Fire Department does not inspect annually. Additionally, we lack sufficient inspection personnel to issue/require mandated permits as required by MGL Ch 148 and CMR 527.

The towns of Mansfield and North Attleboro have two officers performing these duties. The City of Taunton has three officers performing these duties. New Bedford has seven and Fall River has nine.

The Attleboro Fire Department has only one officer performing these duties. The lack of sufficient fire inspectors presents a major risk to the safety of the community and to firefighters.

3.2.2 Training Officer

This officer is responsible for developing, implementing, and evaluating all fire department training activities. The Insurance Services Organization (ISO) is an organization that rates all fire departments in the United States (1 – 10 scale, 1 is the best) based on a complicated evaluation that considers staffing, apparatus, equipment, water supply, dispatch, and training.

The rating established by ISO is utilized by most insurance companies when determining insurance premiums for property owners. The City of Cambridge is the only community in Massachusetts with a rating of “1”. This results in a significant decrease in insurance premiums for the residents and business owners in Cambridge. The City of Attleboro has an ISO rating of “4”, which is slightly low for similar sized municipal departments.

The training requirements required by ISO to receive maximum credit for fire department training are impossible to meet without a full-time training officer. ISO requires each department member to complete 12 single-company evolutions annually, 4 multi-company evolutions annually, night evolutions, and at least 20 hours of company training each month to receive full credit for training.

There are additional requirements for extensive annual driver training and officer training. Effective record keeping of all departmental training is crucial to an improved ISO rating. Training is probably the most cost effective method at improving a department’s ISO rating thus reducing insurance premiums for property owners.

A typical insurance premium may be reduced by 3% when a City’s ISO rating is improved by one. If the City of Attleboro maintained an ISO rating of “1” like the City of Cambridge, the typical property insurance premium might be reduced by as much as 9%. Obviously this is a long-term goal that would require significant planning to implement; however, it is probably worth researching the feasibility of such a plan.

The Attleboro Fire Department does not have a full-time training officer.

3.2.3 EMS Officer/ALS Director

The EMS Officer/ALS Director is responsible for overseeing the day-to-day operations of the EMS service delivery. These responsibilities include:

- Supervising EMS personnel
- Assisting the Chief with long range EMS planning and goal establishment
- Assisting the Chief with development, implementation, and compliance with all departmental EMS policies, procedures, and directives
- Overseeing departmental mentoring program for new EMS personnel
- Providing QA/QI for all EMS incidents
- Assisting the Chief with the development, implementation, and oversight of Fire Department EMS budget
- Responding to EMS/fire incidents as necessary and assuming any required position(s)
- Ensuring safe operation of EMS equipment
- Providing training for EMS personnel
- Assisting with other administrative duties as directed by the Fire Chief

The Attleboro Fire Department currently utilizes the position of ALS Director. The position is filled with a Captain/Paramedic. The lack of high level rank impedes the effectiveness of this position.

3.2.4 Fire Alarm Superintendent

The Fire Alarm Superintendent is responsible for overseeing the day-to-day operations of the municipal fire alarm system. These responsibilities include:

- Providing annual tests of all master box (radio box) fire alarm systems. There are more than 250 radio boxes in service now.
- Providing master box (radio box) fire alarm system disconnects when fire alarm technicians or sprinkler contractors are inspecting/servicing systems.
- Replacing master box (radio box) fire alarm system batteries at designated intervals.
- Maintaining the municipal fire alarm system including wired (copper, fiber optic) and wireless infrastructures.
- Responding to incidents as necessary and assuming any required position(s).
- Maintaining all fire department radio communications equipment.
- Reviewing fire alarm plans
- Assisting dispatch during significant incidents
- Providing communications training for personnel
- Assisting with other administrative duties as directed by the Fire Chief

The Attleboro Fire Department has one (1) Fire Alarm Superintendent.

3.2.5 Assistant Fire Alarm Superintendent

The Assistant Fire Alarm Superintendent assists the Fire Alarm Superintendent and provides coverage in his absence.

The Attleboro Fire Department does not have an Assistant Fire Alarm Superintendent. In the absence of the Superintendent, overtime is utilized as necessary to provide the required coverage.

4 Large Fire Department Structure

In larger fire departments, it is common to see all of the previously discussed positions and ranks. Large

departments may have 20 or more fire stations and more than 50 in-service Companies. Figure 3 demonstrates a typical structure of a very large fire department, the Tempe, Arizona Fire Department. The department has more than 180 employees.

As the organizational chart shows, there are seven (7) Deputy Chiefs supervising platoons or administrative divisions. Additionally, there are 3 Assistant Chiefs who supervise the 7 Deputy Chiefs. This is the most common type of structure found in modern, progressive departments.

5 Small Fire Department Structure

In smaller fire departments, it is common to see some of the previously discussed positions and ranks. Very small departments may have all administrative responsibilities assigned to one person, although it is not common. There is typically one Deputy Chief who assists the Chief in all departmental areas of responsibility.

The Towns of Mansfield, North Attleboro, and Norton all have one Deputy Chief who functions as the Assistant Chief. The Town of Plainville has recently approved the addition a full-time Assistant Chief (Deputy Chief). The Deputy Chief in these departments works an administrative schedule (Monday – Friday) and has extensive administrative and operational responsibilities. This provides enhanced continuity across the four different shifts.

Figure 4 demonstrates a typical structure of a much smaller fire department.

6 Rank Structure Considerations

It is important to point out that the previously discussed ranks are not all-inclusive. Some departments have other positions not discussed, such as Engineers, Operators, Senior Firefighter, etc. Although there are numerous variations, the fundamental concept of span-of-control is the factor that ultimately determines the most effective rank implementation within a department. According to the NIMS, in ICS, the span of control of any individual with incident management supervisory responsibility should range from 3 to 7 subordinates, with 5 being optimal.

It is also important to recognize that unique department specific characteristics must be considered when developing the most effective rank structure. For example, not all departments provide Emergency Medical Services. As EMS service expands, it is imperative that we proactively plan for the changes that are required to ensure that we are able to provide the necessary services to the community. Budgetary constraints must be balanced with realistic goals to ensure responsible use of limited financial resources.

7 Attleboro Fire Department Structure

7.1 Company Officers

The Attleboro Fire Department does not currently utilize Lieutenants in any capacity. In order for the chain-of-command to function adequately, all personnel should directly report to only one supervisor. Currently, several administrative personnel report to more than one supervisor. This is highly ineffective and results in duplication of effort and inefficient communication. Additionally, a supervisor should directly supervise only 5 subordinates. This is a well recognized NIMS ICS standard for incident management and also for normal administrative activities.

The lack of Lieutenants causes eight (8) firefighters each day to work without immediate

supervision. The following Companies do not have a Company Officer assigned to the apparatus:

- Rescue-1
- Rescue-2 / Ladder-2
- Ladder-1
- Engine 4

These firefighters report to various Captains. The two firefighters assigned to Engine-4 function with no immediate supervision/accountability. The Brigg's Corner Fire Station is the only station without an officer assigned to the apparatus. Because the twelve (12) company officers assigned to the other stations are equal in rank, there is no clear authority when the Deputy Chief (Platoon Commander) is not on-scene and more than one Captain is present.

Captains are assigned to the following positions on each shift:

- Headquarters Engine 1
- South Attleboro Engine 2
- Twin Village Engine 5

7.2 Deputy Chiefs / Platoon Commanders

The Attleboro Fire Department utilizes the rank of Deputy Chief as Platoon Commanders. The Deputy Chiefs function as District Chiefs. They are responsible for the activity of their respective platoons. They supervise the three (3) Captains assigned to their shifts and also supervise the 8 firefighters who do not have company officers directly supervising them.

The insufficient number of company officers results in a span of control as high as 11-to-1. As previously discussed, the nationally recognized standard dictates that the span of control for any individual with incident management supervisory responsibility should range from 3 to 7 subordinates with 5 being optimal.

Typically, the Deputy Chiefs have all been given various administrative responsibilities; however, this has been problematic for more than 25 years. Some of the problems encountered with this configuration are as follows:

- Because of the work schedule, Deputies assigned to shifts are not able to maintain continuity with any special areas of responsibility.
- Each Deputy Chief directly interacts with only two of the three other Deputy Chiefs.
- Because the four (4) Deputy Chiefs are the same rank, there is no clear supervisor other than the Chief. This leads to shifts that tend to function independently and causes significant tension among the four (4) shifts.
- Because there is insufficient administrative staff, the Deputy Chiefs manage many day-to-day activities of their shifts, such as scheduling training, scheduling apparatus maintenance, assigning employees, performing housekeeping, and other administrative activities. This also results in variations across the four (4) shifts since there is not one supervisor overseeing these responsibilities.
- Important administrative information is difficult to disseminate to the four (4) shifts with this configuration. Currently, it is necessary to meet with each Deputy Chief individually and also provide written correspondence to ensure that all important information is distributed. This is an extensively time consuming, inefficient process.

7.3 Fire Prevention Captain

The Attleboro Fire Department Fire Prevention Captain is responsible for the enforcement of the Fire Code based on M.G.L. Chapter 148 and C.M.R. 527 Fire Prevention Regulations. These regulations are based on the model fire code as established by the National Fire Protection Association (NFPA) and other recognized standards. The position requires an extensive amount of study and research to ensure effective code enforcement. The responsibilities of the position include:

- M.G.L. 148, Section 26F smoke detector inspections
- Oil burner installation inspections
- Propane tank installation inspections
- Underground storage tank (UST) installation inspections
- Combustible and flammable liquid storage inspections
- Flammable gas storage inspections
- Carbon monoxide detector installation inspections
- Commercial fire alarm system plan review/inspections
- Fire sprinkler system installation inspections/plan review
- Tank truck inspections
- Life safety inspections of businesses
- Fire code violation inspections
- Self service gas station inspections
- Plan review for all gas stations
- Enforcement of all fire prevention codes/regulations
- Pre-construction plan review
- Issuing permits for explosives, fumigation, black powder storage

This is not an all-inclusive list. The Massachusetts Fire Prevention Code is an extensive document that fire departments are mandated to enforce. The Fire Prevention Captain has a significant work load and frequently must make difficult decisions regarding prioritizing work. There is sufficient work in the Fire Prevention Office to keep two (2) inspectors busy.

On-duty crews perform “Quarterly Inspections” (4 times per year) of schools, nursing homes, hospitals, day cares, group homes, assisted living complexes, elderly housing complexes, and other businesses. This is a standard practice nationally. Utilizing on-duty crews for these inspections provides valuable knowledge for on-duty crews; however, the Fire Prevention Captain must review all the inspection reports completed for these inspections.

The major deficiency with this position is that it is provided by the rank of Captain. It is very difficult for the Fire Prevention Captain to interface with other Captains and ensure that inspections are being performed correctly, completely, and accurately. It is even more difficult for the Fire Prevention Captain to address these issues with the four (4) Deputy Chiefs since the Fire Prevention Captain is a subordinate position.

Essentially all fire departments have a higher ranking officer in charge of the Fire Prevention Bureau. Typically, the position is filled by a Deputy Chief or District Chief to provide the necessary authority to ensure compliance by on-duty crew members.

7.4 ALS Director

The ALS Director is responsible for overseeing the daily operations of the EMS Service Delivery for the City of Attleboro. The responsibilities of this position include:

- Supervising EMS personnel
- Assisting the Chief with long range EMS planning and goal establishment
- Assisting the Chief with development, implementation, and compliance with all departmental EMS policies, procedures, and directives
- Overseeing departmental mentoring program for new EMS personnel
- Providing Quality Assurance (QA)/Quality Improvement (QI) for all EMS incidents
- Assisting the Chief with the development, implementation, and oversight of Fire Department EMS budget
- Responding to EMS/Fire incidents as necessary and assuming any required position(s)
- Ensuring safe operation of EMS equipment
- Providing training for EMS personnel
- Assisting with other administrative duties as directed by the Fire Chief

The current ALS Director has effectively managed and improved the EMS System; however, there have been some problems with the effective implementation of this position. The major deficiency with this position is that it is provided by the rank of Captain. It is very difficult for the ALS Director to address these issues with Captains and the four (4) Deputy Chiefs since the ALS Director is a subordinate position.

The responsibilities of this position would be more effectively implemented by a higher ranking officer in charge of the EMS service delivery. This would ensure department-wide compliance, and acceptance. It would be significantly more effective to utilize the rank of Deputy Chief or District Chief to provide the necessary authority to ensure compliance by on-duty crew members.

7.5 Companies without Company Officers

As previously discussed, there are numerous companies within the current structure that do not have a company officer. There are numerous disadvantages with this format; however, the most significant is the inherent lack of accountability and supervision. The problem is compounded during fire ground operations. Fire ground operations require highly trained personnel who are familiar with firefighting strategies and tactics, understand Incident Command, and have demonstrated leadership capabilities. All personnel who may become involved in incident mitigation activities **must** have an immediate supervisor to whom they report.

Specific companies that routinely function during incident mitigation without the immediate supervision of a company officer are discussed in the following sections.

7.5.1 Ladder-1

Ladder-1 is the primary ladder truck for the City of Attleboro. Ladder company responsibilities are very physically demanding. The responsibilities of a ladder company include search and rescue, ventilation, salvage, overhaul, forcible entry, vehicle stabilization during extrication, and other tasks.

Ladder-1 is staffed with only two firefighters. There is no company officer assigned to the apparatus. This results in firefighters working without direct supervision in potentially dangerous conditions. Company officers are more highly trained and better skilled at completing the strategies directed by the

Incident Commander.

A two-person ladder company is ineffective when performing the tactics assigned to them at incident. The national standard for staffing fire apparatus requires one (1) officer and three (3) firefighters. These standards have been developed based on extensive research that considers response time, time to complete fire ground tasks, firefighter safety, and effective rescue and fire suppression.

7.5.2 Ladder-2

Ladder-2 is the primary ladder truck for the south portion of the City of Attleboro. Ladder-2 is staffed with only two firefighters who also staff Rescue-2. Although this may be less than optimal, it has allowed the City of Attleboro to keep a second ladder truck in service. There is no company officer assigned to the apparatus. This results in firefighters working without direct supervision in potentially dangerous conditions. Company officers are more highly trained and better skilled at completing the strategies directed by the Incident Commander.

A two-person ladder company is ineffective when performing the tactics assigned to them at incident. The national standard for staffing fire apparatus requires one (1) officer and three (3) firefighters. These standards have been developed based on extensive research that considers response time, time to complete fire ground tasks, firefighter safety, and effective rescue and fire suppression.

7.5.3 Rescue-1

Rescue-1 is the busiest company in the City. Although the primary responsibility of the members assigned to Rescue-1 is providing emergency medical service, they are also utilized as firefighters at all structure fires. The members assigned to Rescue-1 function without direction supervision unless they are directed to “team up” with another company on the scene. They are commonly assigned to work with a ladder company or engine company. Because of the large volume of EMS incidents, Rescue-1 personnel are frequently not available for firefighting activities.

7.5.4 Rescue-2

Rescue-2 is the ambulance assigned to the south portion of the City. Although the primary responsibility of the members assigned to Rescue-2 is providing emergency medical service, they are also utilized as firefighters at all structure fires. At structure Fires, the members of Rescue-2 staff ladder-2 and function as a ladder company without a company officer. Because of the large volume of EMS incidents, Rescue-2 personnel are frequently not available for firefighting activities.

7.5.5 Engine-4/Rescue-4

Engine-4 is a two-person engine company housed at the Brigg’s Corner Fire Station. There is no company officer assigned to the apparatus. This results in firefighters working without direct supervision in potentially dangerous conditions. Company officers are more highly trained and better skilled at completing the strategies directed by the Incident Commander.

A two-person engine company is ineffective when performing the tactics assigned to them at incident. The national standard for staffing fire apparatus requires one (1) officer and three (3) firefighters. These standards have been developed based on extensive research that considers response time, time to complete

fire ground tasks, firefighter safety, and effective rescue and fire suppression.

Engine-4 is the only Advanced Life Support (ALS) engine company in the City of Attleboro. They respond to all medical incidents in their district to initiate advanced life support and also respond to structure fires and other related incidents.

When a third ambulance is needed anywhere in the City of Attleboro, Rescue-4 is utilized to provide this service. The same crew members assigned to Engine-4 are also assigned to Rescue-4.

8 Recommendations

The following sections include recommendations to correct the most important deficiencies identified by within this document. Refer to figure 1 and figure 2 to compare the current AFD organizational structure with the proposed structure.

8.1 Restructure Plan

As shown in the organizational diagrams, the proposed restructuring will result in the following rank assignments:

- Fire Chief – 1
- Assistant Chief (Deputy, non-union) – 1
- District Chiefs – 6 (4 Platoon District Chiefs and 2 Administrative District Chiefs)
- Captains – 8
- Lieutenants – 16
- Firefighters – 80
- Fire Alarm Superintendent – 1
- Fire Inspector – 1

8.1.1 Restructuring Advantages

8.1.1.1 Significantly Improved Span-of-Control

With this implementation, the Headquarters (HQ) Fire Station and the South Attleboro (SA) Fire Station will have a Captain assigned to the Engine Company. The HQ Captain will manage day-to-day activities at both HQ and at the Brigg's Corner (BC) Station. The SA Captain will manage day-to-day activities at both SA and at the Twin Village (TV) Station. At most incident scenes, there will only be one Captain and 2 Lieutenants.

The TV and BC Fire Stations will have a Lieutenant as the company officer. The Lieutenant will directly supervise the company. There will also be a Lieutenant assigned to Ladder-1. This will ensure that each primary fire apparatus will have a company officer and two (2) firefighters assigned. This will improve firefighter safety, incident management, and accountability significantly.

8.1.1.2 Ability to Easily Expand Structure

The proposed structure has been designed to ensure possible expansion as necessary. For example, a full-time Training Officer (as previously discussed) could be implemented and placed under the authority of the EMS District Chief or additional inspectors could be implemented and placed under the authority of the Fire Prevention District Chief. As the demands placed upon the fire service expand, it is imperative that we

provide the management structure to meet these obligations and responsibilities.

8.1.1.3 Improved Command Staff Interactions

Because five (5) out of eight (8) Command Staff personnel (Chief, Assistant Chief, 6 District Chiefs) will be on duty Monday-Friday, there will be a tremendous improvement in departmental communications. Daily / weekly staff meetings will ensure proper dissemination of operational orders, executive orders, directives, and policies and procedures.

The addition of an Assistant Chief (Deputy, non-union) will improve institutional memory, accountability, and safety.

8.1.1.4 Improved Fire Ground Safety and Incident Mitigation

At larger incidents, the two Administrative District Chiefs could respond to the incident as necessary and assist the Incident Commander as needed. The addition of Lieutenants on Ladder-1 and Engine-4 will improve firefighter safety and enhance the ability of the department to meet the needs of the community.

8.1.1.5 Improved Fire Prevention Capabilities

As previously discussed, The Attleboro Fire Department presently has just one Fire Prevention Captain assigned to the Fire Prevention Division. With only one inspector, the department is unable to conduct many required inspections. We have been forced to limit our prevention activities to the highest risk facilities. This presents a significant risk to the community and to firefighters. The addition of another inspector will greatly improve community safety and firefighter safety.

8.1.1.6 More Consistent Day-to-Day Operations

The addition of the Assistant Chief (Deputy, non-union) will significantly improve consistency of administrative and operational matters across the four (4) shifts. The District Chiefs will report *directly* to the Assistant Chief (Deputy, non-union) increasing accountability and improving departmental efficiency.

With the position of Assistant Chief, the department will function the same when the Chief is absent for any amount of time. Currently, there is no way to ensure operations are managed the same each day.

8.1.1.7 Improved Department Morale

The increased number of promotional opportunities will provide motivation for employees to study and improve their skill sets. This will produce more highly trained personnel which will improve firefighter safety and incident mitigation capability. Increased opportunity for advancement will improve departmental morale and provide employees with opportunities that have not been available.

8.1.2 Restructuring

8.1.2.1 Civil Service and Union Ratification

Because the fire department currently has four (4) Deputy Chiefs and thirteen (13) Captains, it is not possible to drop down to one (1) Deputy or eight (8) Captains without requiring demotions and Civil Service involvement.

It is recommended that the restructuring plan be implemented in a manner that does not require Civil Service reclassification approval. Thus, I suggest changing current staff's job functions to facilitate

implementation of the plan. Through attrition, the identified positions will be replaced with staff that have been selected off the appropriate future Civil Service list.

Additionally, the Union has ratified the changes in this reorganization.

8.1.2.2 Required Modifications to City Ordinance

The current City Ordinance regulating fire department staffing allows for the following sworn positions:

- Chief (1)
- Deputy Chiefs (4)
- Captains (13)
- Firefighters (80)
- Superintendent of Fire Alarms (1)
- Assistant Superintendent of Fire Alarms (1)

It will be necessary to obtain Municipal Council approval for this restructuring. The modified ordinance would need to be flexible initially as follows:

- Chief (1)
- Assistant Chief (Deputy, non-union) (1)
- District Chiefs (6)
- Captains (12) (*decreasing to 8 through attrition)
- Lieutenants (16)
- Firefighters (80)
- Superintendent of Fire Alarms (1)
- Assistant Superintendent of Fire Alarms (1)

*Specific dates for implementation of attrition will need to be determined.

9 Executive Summary

Timing is crucial to the successful implementation of change in any organization. The implementation of Engine-4 as an ALS Engine Company and Rescue-4 as a third ambulance has demonstrated that significant change can be successfully implemented within the Attleboro Fire Department.

The following list summarizes the problems identified in this document:

- Lack of company officers on Engine-4, Ladder-1, and Ladder-2
- Insufficient staffing levels on Engine-4, Ladder-1, and Ladder-2
- Unmanageable span-of-control (11-to-1) at incidents
- Insufficient administrative staff to meet daily objectives
- Inefficient departmental management structure
- Inefficient inter-departmental communications
- Lack of a true “second in command”
- Ineffective structure to maintain institutional knowledge
- Insufficient fire prevention staffing leading to inadequate fire code enforcement

Compounding these problems are several other important points to consider:


- The Attleboro Fire Department emergency incident responses have increased by 12% over the last 10 years (6,600 annually now)
- Required inspections continue to increase annually (more than 1,000 annually now)
- EMS personnel routinely transport to Rhode Island Hospital, reducing available personnel for subsequent incident mitigation.
- Modern construction techniques utilize light weight building construction components that result in fires that spread quicker, burn hotter, and lead to rapid structural failure. Modern buildings may completely fail when exposed to fire for as little as 10 – 15 minutes.
- Responsibilities placed on the fire service continue to increase. The modern fire service is an integral component of homeland security and hazardous materials incident response.

These are just some of the challenges that the fire department must manage.

The beginning of FY2015 presents an important opportunity to implement the previously discussed reorganizational plan. The Fire Department will experience major personnel changes during the next 3 – 5 years. As many as 30 members may retire during this period. Nearly half of the fire department will be replaced by 2018. Implementation of this reorganization plan will address the problems identified in this document.

With careful planning, responsible utilization of financial resources, and progressive “outside the box” thinking, the Attleboro Fire Department can become a model for other communities to emulate.

Respectfully submitted,



Scott T. Lachance

Fire Chief

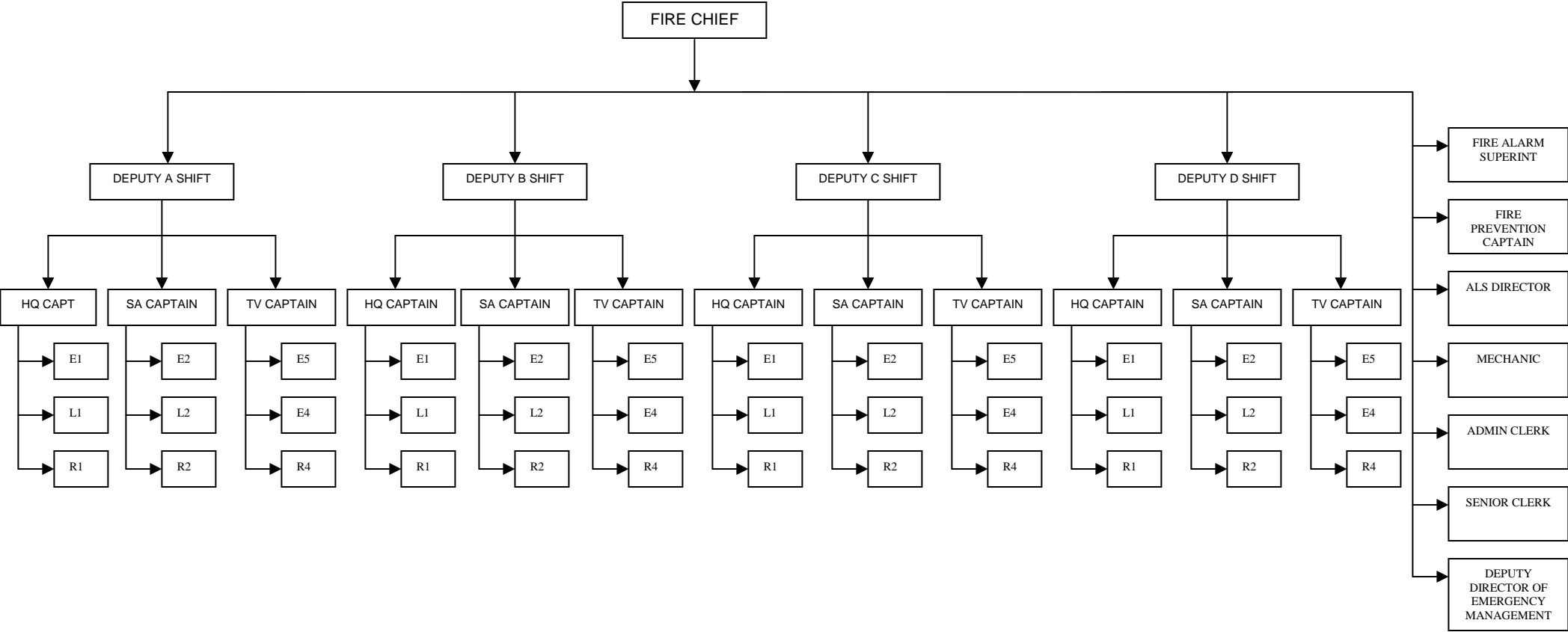


Figure 1.
Current Attleboro Fire Department Structure

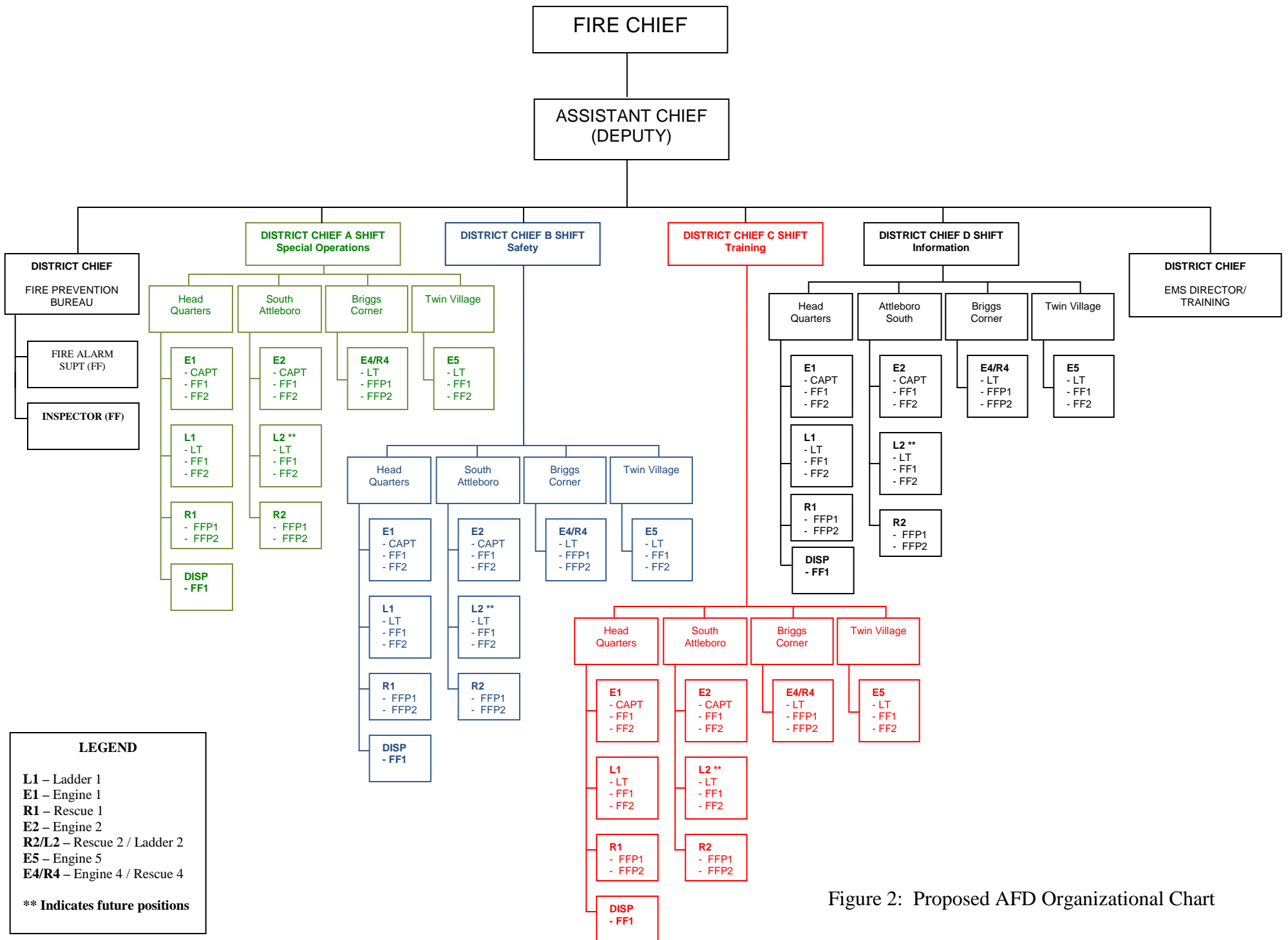
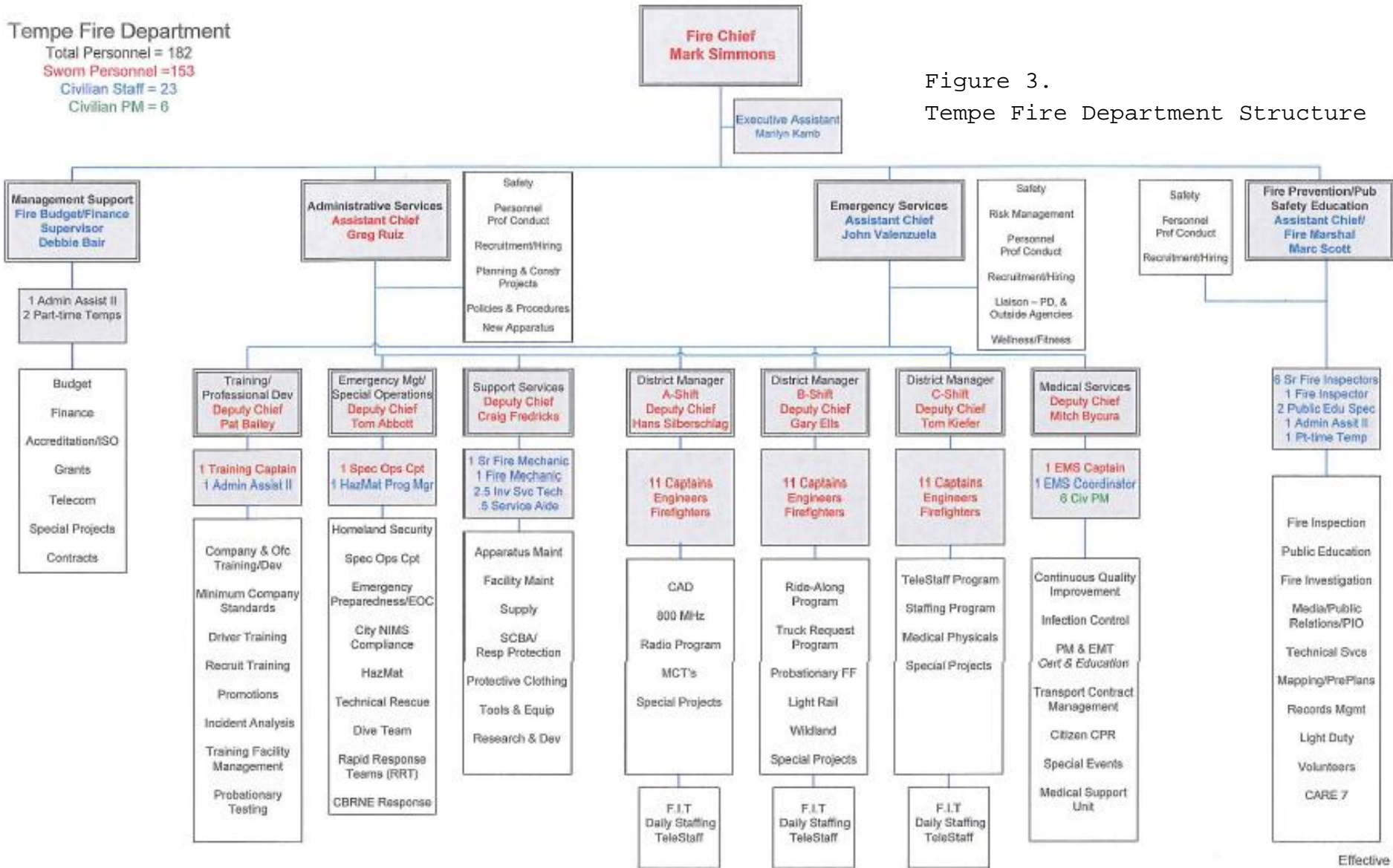


Figure 2: Proposed AFD Organizational Chart

Total Personnel = 182
Sworn Personnel = 153
Civilian Staff = 23
Civilian PM = 6



37 SWORN EMPLOYEES
1 CIVILIAN EMPLOYEE

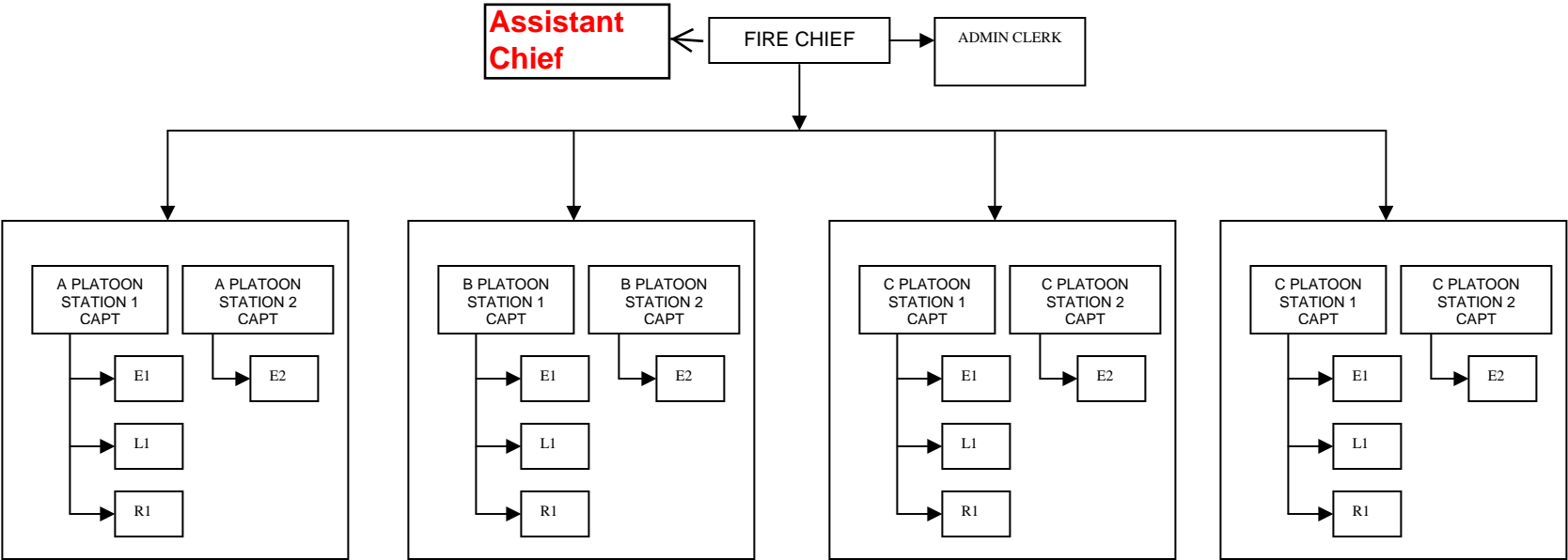


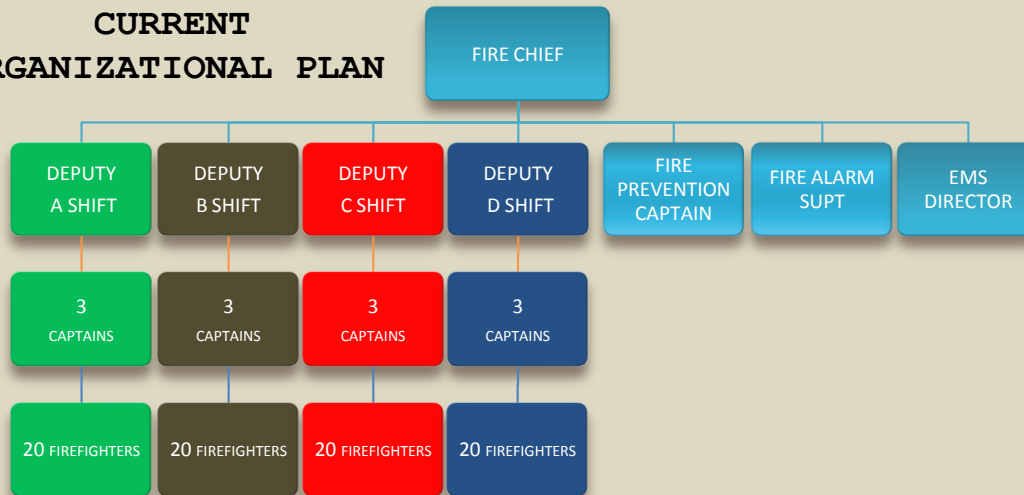
Figure 4.
Small Fire Department Structure

Administrative Staffing Comparisons as of 4/1/2014						
Division	Position	Attleboro 43,500	Fall River 90,000	Taunton 56,000	New Bedford 97,000	Falmouth 33,000
Chief's Staff	Admin. Asst (civilian)	0	1.5	1	2.5	2
	Admin Asst (uniformed)	0	1	0	0	0
	Asst Chiefs	0	1	0	1	2
Fire Alarm	Fire Alarm Supt / Comm Officer	1	1	1	1	1
	Information Officer (Computers, radios)	0	1	0	1	0
	Asst Fire Alarm Supt	0	0	0	2	0
Fire Prevention	Fire Marshal (Division Sup.)	0	1	1	1	1
	Asst Fire Marshal	0	1	0	0	0
	Fire Inspectors	1	7	2	5	2
	Clerk/Secretary	1	0	0	1	0
Training	Training Officer	0	1	1	1	0
	Asst Training Officer	0	2	0	0	0
Public Education/SAFE	SAFE Officer	0	1	1	0	0
	Asst SAFE Officer	0	0	0	0	0
EMS**	EMS Director	1	1	0	0	0
	Asst EMS Director	0	1			
	QA/QI Specialist	0	1			
	Billing Clerks / payroll	1	3	0	0	0
Custodial/BLDG Maint	Custodians	0	0	0	0	0
	Maintenance	0	0	0	0	0
Apparatus Maintenance	Foreman	0	1	0	0	0
	Mechanics	0	3	1	3	2
Total Staff Personnel		5	28.5	8	18.5	10
Total Excluding EMS Staff		3	24.5	8	18.5	10
Admin Staff per 10,000 residents		0.6896552	2.7222222	1.42857	1.907216495	3.030303

Figure 5 Administrative Staffing Comparisons

ATTLEBORO FIRE DEPT REORGANIZATIONAL PLAN

CURRENT ORGANIZATIONAL PLAN



PROPOSED ORGANIZATIONAL PLAN



RESULTS

