

**FINAL STATEMENT OF REASONS
CALIFORNIA CODE OF REGULATIONS
TITLE 19, PUBLIC SAFETY
DIVISION 1, STATE FIRE MARSHAL
CHAPTER 13**

SUMMARY OF EFFECT OF PROPOSED REGULATIONS

These regulations will implement training requirements and standards for the implementation of the California Fire Service Training and Education Program Act and the California Fire and Arson Training Fund Act (CFAT). These regulations will also impact the California Fire Service and related stakeholders by administering a voluntary certification training system for all position levels of the California Fire Service. This regulatory proposal clarifies and updates the training requirements and associated fees in California and those documents incorporated by reference.

The SFM received two (2) public comments on the proposed regulations as originally noticed.

UPDATE TO THE INITIAL STATEMENT OF REASONS

The Initial Statement of Reasons (ISOR), released January 31, 2025, is incorporated by reference herein, and contained a description of the rationale for the adoption of the proposed regulations. On January 31, 2025, all documents relied upon and referenced in the ISOR were made to the public. The original text of the proposed regulations was made available to the public for at least 45 days starting January 31, 2025, through March 21, 2025.

The Office of the State Fire Marshal (OSFM, SFM) received two (2) public comments from two (2) people on the text as originally noticed during the 45-day comment period. Upon review and consideration of the comments received, the OSFM determined that modifications to text of the regulations were necessary. In addition, the OSFM made internal nonsubstantive editorial modifications to text.

Modifications to the text of the proposed regulations to the ISOR, which are incorporated by reference herein, were released for an additional 15-day public comment starting November 26, 2025, through December 11, 2025. No comments were received on December 11, 2025.

There have been no changes in the applicable laws or to the effects of the proposed regulations from those described in the Initial Statement of Reasons (ISOR) published with the Notice of Proposed Regulatory Action. The OSFM has considered all relevant matters presented to it and recommends approval of the proposed regulatory action.

PUBLIC COMMENT PERIOD

The SFM made available to the public a 45-day written comment period for the proposed regulation from January 31, 2025, through March 21, 2025. A public hearing

was not held nor requested. Following the close of the 45-day public comment period, there were two (2) public comments received, and no changes made to the text of the proposed regulations. There were no further comment periods.

The SFM made available to the public an additional 15-day written comment period for the proposed regulation from November 26, 2025, through December 11, 2025. A public hearing was not held nor requested. Following the close of the 15-day public comment period, there were no additional public comments received. Only internal editorial changes were made to the 45-Day Comment Period of the proposed regulations. There were no further comment periods.

SUMMARY AND RESPONSE TO COMMENTS RECEIVED DURING THE 45-DAY PUBLIC COMMENT PERIOD FROM JANUARY 31, 2025, THROUGH MARCH 21, 2025

The SFM received two (2) public comments in response to the initial notice.

1. Peter Golling, Chief, Burbank-Paradise Fire District

Comment #1: General Comment. The summary of the comment is to amend existing, unchanged text to allocate funds to alleviate perceived strain on program participants.

Response: The Department will not be making any changes to text regarding this issue as it was not a part of this regulation package and is therefore outside the scope of intent. This topic has been received by the stakeholders and will be reviewed by the appropriate steering committees for further consideration.

2. Linda Vaughn, Regional Director, Public Safety Sector

Comment #2a: California Code of Regulations, Section 1990.08. The summary of the comment is the identification of editorial error in text.

Response: The Department believes this is a valid clarifying change and not substantive to the intent or application of the affected section as the text was an unintended error. This change will be made. 1990.08 was amended to replace “of” with “or” for grammatical correctness.

Comment #2b: California Code of Regulations, Section 1990.08. The summary of the comment is to amend existing, unchanged text to make explicit the written notification provided by SFT of violation.

Response: Written notification is the standard practice of SFT. The Department has considered this comment and has included verbiage specific to written notification to make explicit the standard practices of SFT.

SFM EDITORIAL MODIFICATIONS AFTER THE CLOSE OF THE 45-DAY PUBLIC COMMENT PERIOD

After the close of the comment period, staff identified and made editorial modifications to the following items:

1. Text of Regulations, Section 1990.00. Incorporated References, has been expanded upon and renumbered to include the development and publication dates of each incorporated reference found in the *State Fire Training Procedures Manual*, Section 12: Forms and Checklists.
2. Text of Regulations, Section 1990.01(a). Training Standards, has been amended to provide clarity and remove verbiage referencing “Index” and “Indexes” as the terms previously proposed are not considered incorporated reference documents and not reflective of change to business practice or regulatory requirements.
 - a. Text of Regulations, Section 1990.00(a)(9) Registered Evaluator Code of Conduct has been relocated to Section 1990.00(a)(7); and amended to align with the verbiage used to identify and correlate the form’s title Registered Certification Examination Evaluator Code of Conduct.
 - b. Text of Regulations, Section 1990.00(a)(10) Certification Examination Retake Application (January 2016) has been amended to align with the verbiage used to identify and correlate the form’s title, Regional Training and Academy Accreditation Application.
3. Text of Regulations, Section 1990.01(b) has been removed as the proposed items are not considered incorporated reference documents. The proposed list identified informational items that are not reflective of change to business practice or regulatory requirements.
4. Text of Regulations, Section 1990.04. Instructors., has been amended to remove reference to Assistant Instructors as this instructor qualification has been retired. This deletion corrects an oversight in not removing text during initial regulatory document submittal. Nonsubstantial editorial change to amend subsections in alignment with regulatory formatting throughout section.
5. Text of Regulations, Section 1990.04(a)(3) has been amended to renumber text following deletion of previous subsection 3 regarding Assistant Instructors per the aforementioned deletion of text following qualification retirement. The section further incurs editorial correction to renumber bulleted subsections for text standardization. Editorial update to amend cross-referenced section from 1990.04(b)(1)(2) to 1990.04(3)(A)(B)(C) for accuracy.
6. Text of Regulations, Section 1990.05(d) has been edited to include corrected punctuation for sentence structure. The existing comma has been replaced with a period.
7. Text of Regulations, Section 1990.06. Safety Policy., has been amended to add “Training” for appropriate designation of agency. Identifying text (underline) was inadvertently not identified in initial regulatory submittal.
8. Text of Regulations, Section 1990.08. Suspension, Denial, Decertification, Revocation, or Expulsion, has been amended to include “Denial” in titling for consistency and accuracy of actions, as listed. This addition provides clarity for system users of all potential disciplinary actions.

9. Text of Regulations, Section 1990.08, contains an editorial correction to replace “of” with “or” for grammatical correctness. Editorial addition of “via written notification” for specificity regarding action notification made by State Fire Training. The Department has reconsidered public comment #2b and has included language specific to written notification.
10. Text of Regulations, Section 1990.08(d), has been amended to remove “violation of” as the remaining proposed text is definitive and encompassing without the additional verbiage. Editorial deletion of “, or” per removal of subsection (e) for grammatical correctness and list completion.
11. Text of Regulations, Section 1990.08(e), has been removed for succinctness as the remaining proposed section text is encompassing without additional verbiage.
12. Text of Regulations, Section 1990.09(a), has been amended to correct “any” to “An,” for grammatical correctness. Editorial deletion of “or” with introduction of “or revoke” for regulatory consistency with earlier section 1990.08. The section further includes addition of “via written notification” for specificity regarding action notification made by State Fire Training.
13. Text of Regulations, Section 1990.10. Reinstatement, has been amended to replace “may” with “shall” to alleviate unclear intent of text. This change provides for clarity for system users.
14. Text of Regulations, Section 1990.12(b), has been amended to relocate “Burn Boss” fees to alphabetical listing with appropriate titling for terminology alignment. Editorial update to replace Instructor numerals with numeric for proper identification of these certifications.
15. Text of Regulations, Section 1990.12(e) has been amended to remove “Exam Proctor” as this qualification does not yet exist in the program. This change provides clarity regarding current qualification options.
16. Text of Regulations, Section 1990.12(e) has been amended to include inadvertently omitted Accredited Academy Fees specific to the Fire Fighter 1 (2024) and Fire Fighter 2 (2024) Exam Registration and Certification. There is optional version for stakeholder participation, this addition provided clarity for system use. Editorial addition of “s” to “skill sheets” for pluralization and grammatical correctness.
17. Document incorporated by reference, *State Fire Training Procedures Manual*, page 2: Updated the title page with a staggered overlay image of CAL FIRE and State Fire Training logo.
18. Document incorporated by reference, *State Fire Training Procedures Manual*, Page 11, “Welcome” editorial addition of “s” to “editions” for grammatical correctness and accurate reflection of textual change.
19. Document incorporated by reference, *State Fire Training Procedures Manual*, Acronym Glossary, removal of “CoTS = Course Training Standard” as the proposed items are not considered incorporated reference documents and are thus being removed from text.
20. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 1.1.1: Overview, reintroduction of existing flow chart inadvertently omitted from document submittal.

21. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 1.2.4: Acquisition, editorial correction to reflect previously published website address that is to be removed and referenced with current website. Previously published draft incorrectly referenced website address.
22. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 2 titling amendment. Editorial change to decapitalize title for standardized formatting alignment with document
23. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 3.5.2(D)(3)(4), editorial change from “Schedule” to “Schedules” and “Discuss” to “Discusses” for grammatical correctness.
24. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 3.5.2(D)(4), editorial change to underline “with” and “facility” for inclusion of added text inadvertently omitted from initial submittal.
25. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 3.3(A)(18) renumbered addition differing from initial submittal. No change to content, section realignment only.
26. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 4.1.2(A) amended to provide clarity for standards and deadlines. Grammatical correction to provide clarity.
27. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 4.1.2(B) has been stricken as this deadline has passed and is no longer applicable. Editorial addition of information to provide clarity to the authorized signer submittal process for codification.
28. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 4.3.2(E) editorial change to insert space between “letter” and “so” for grammatical correctness. Editorial update to remove duplicate (E) and replace with (F) for correct formatting.
29. Document incorporated by reference, *State Fire Training Procedures Manual*, editorial reentry of Section 4.6: State Fire Training Fees. This previously published section was inadvertently deleted in submitted regulatory package. No change to content or text.
30. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 4.8.1(A)(1) editorial deletion of “published” for accuracy.
31. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 4.8.1(A)(4) editorial addition of “in alignment with curriculum updates” for accurate identification of requirement compliance.
32. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 5.1.8.2(G) renumbered addition differing from initial submittal. No change to content, section realignment only.
33. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 5.1.10.1(C) deletion as it is duplicative of subsection (A) within same section. Editorial oversight from initial submittal, non-substantive editorial change.
34. Document incorporation by reference, *State Fire Training Procedures Manual*, Section 6.2.9.1(A)(3) editorial deletion of cited webpage as the web address is obsolete. Those seeking responses submit the Class Feedback request to SFT.

35. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 6.9.16.2(F) amended to provide clarity to standards and deadlines. Grammatical correction to reflect deadline accurately.
36. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 6.9.16.2(F)(2) editorial amendment for grammatical correctness.
37. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 6.9.16.10(F)(1) amended to provide clarity to standards and deadlines. Grammatical correction to reflect deadline accurately.
38. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 7, Professional Certification: California Fire Service Training and Education System (CFSTES), header was corrected from “6: Instructors” to “7: Professional Certification” for accuracy.
39. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 9.1.4, non-substantive editorial correction to update section for corrected sequential ordering.
40. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 9.1.3.2, deletion. This previously published section was inadvertently deleted prior to initially submitted regulatory package. This published text is duplicative of the prior section. No change to content or regulatory language and/or intent.
41. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 11.3.1.1(B) renumbered deletion differing from initial submittal. No change to content, section realignment only.
42. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 11.3.3.1(B)(C) renumbered deletions differing from initial submittal. No change to content, section realignment only.
43. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 11.4.2.2(B)(iii) amended to reflect accurate reference section. Editorial change to replace “6.6.1.2” with “11.10: Personnel Registration.”
44. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 11.6.3(B)(4) editorial correction to renumber added text differing from initial submittal. No change to content, section realignment only.
45. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 12.1: Forms and Checklists has been updated to correctly reflect and align the form titles within the text.
46. Document incorporated by reference, *State Fire Training Procedures Manual*, Section 12.1: Forms and Checklists has been updated to include previously deleted “12.6 Request for Course Scheduling” form with “12.4: Course Scheduling Request Form” WebForm example. This reentry resulted in the necessary renumbering of remaining items for sequential ordering.

TECHNICAL, THEORETICAL AND/OR EMPIRICAL STUDIES OR REPORTS

The proposed regulation amendments by the Office of the State Fire Marshal were developed in consultation with both the State Board of Fire Services (SBFS) and the Statewide Training and Education Advisory Committee (STEAC), consisting of

community colleges, local fire, labor, and regulatory personnel all of whom have reviewed and provided recommendations for the proposed regulations.

Documents relied upon: The State Fire Marshal relied on the following sources and entered in the rulemaking record as a document relied upon:

1. Strategic Plan, Blueprint 2020. This strategic plan identifies, defines, and describes an updated training and education model for the California State Fire Training system.

INCORPORATION BY REFERENCE DOCUMENTS FOR THIS RULEMAKING FILE

The proposed regulations in Section 1990.00 incorporate by reference the following administrative procedures consisting of the following document:

1. State Fire Training Procedures Manual (2025)

It would be cumbersome, unduly expensive, or otherwise impractical to publish these documents and forms in the California Code of Regulations. The documents and forms are made available from the agency, or are reasonably available to the affected public from a commonly known or specified source (posted on the State Fire Training website) at <https://osfm.fire.ca.gov/what-we-do/code-development-and-analysis/title-19-development>

EVIDENCE SUPPORTING FINDING OF NO SIGNIFICANT ADVERSE ECONOMIC IMPACT ON ANY BUSINESS

The SFM can find no facts, documents, testimony, or evidence that this action will have a significant adverse economic impact on any business. The proposed regulation clarifies and adds language that better defines the training fee requirements for the California fire service. There is no significant cost impact anticipated as a result of these regulations.

ALTERNATIVES THAT WOULD LESSEN ADVERSE ECONOMIC IMPACT ON SMALL BUSINESS

No alternatives were proposed to the SFM that would lessen any adverse economic impact on small business.

ALTERNATIVES DETERMINATION

The SFM considered reasonable alternatives to the proposed action and determined that no alternative it considered or that was otherwise identified and brought to its attention would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. This conclusion is based on the SFM determination that the proposed action is necessary to implement the use of National Fire Protection Association's (NFPA) Professional Qualifications Standard's as a baseline for certifications and courses as directed through Blueprint 2020. The SFM did not consider any other reasonable alternatives in

the development of this rulemaking beyond that previously identified in the Initial Statement of Reasons.

LOCAL MANDATE DETERMINATION

The proposed regulations do not impose any mandate on local agencies or school districts.

COORDINATION WITH FEDERAL LAW

The SFM has determined that this proposed regulatory action neither conflicts with, nor duplicates, any applicable federal regulation contained in the Code of Federal Regulations. There have been no changes in applicable laws related to the proposed action or to the effect of the proposed regulations from the laws and effects described in the Notice of Proposed Action.