



# Regulatory Program Management (2024)

## Course Plan

### Course Details

<b>Certification:</b>	Fire Marshal
<b>CTS Guide:</b>	Fire Marshal (2024)
<b>Description:</b>	This course provides an overview of the knowledge and skills needed to manage the adoption, modification, and maintenance of codes, standards, and AHJ requirements; manage inspection, plan review, design review, appeals, record-keeping, permit, and complaint reconciliation processes; and manage compliance interpretation, alternative means/methods/materials, and interagency coordination programs.
<b>Designed For:</b>	Personnel preparing to pursue Fire Marshal certification or anyone who manages a regulatory program within their agency.
<b>Prerequisites:</b>	None
<b>Standard:</b>	Complete all activities and formative tests. Complete all summative tests with a minimum score of 80%.
<b>Hours (Total):</b>	30 hours (22.5 lecture / 5.5 application / 2 testing)
<b>Maximum Class Size:</b>	30
<b>Instructor Level:</b>	SFT Fire Marshal Registered Instructor
<b>Instructor/Student Ratio:</b>	1:30 (lecture) 1:15 (application)
<b>Restrictions:</b>	None
<b>SFT Designation:</b>	CFSTES

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## Required Resources

### Instructor Resources

To teach this course, instructors need:

- *Building Department Administration* (International Code Council, 4<sup>th</sup> edition, 2012)
- California Building Code (current edition)
- California Fire Code (current edition)
- *CEQA Deskbook: A Step-By-Step Guide on How to Comply with CEQA* (Solano Press Books, 3<sup>rd</sup> edition, 2012)
- *Guide to Title 24* (California Building Standards Commission, current edition)
- *Legal Aspects of Code Administration* (International Code Council, 2017)
- *Managing Fire and Emergency Services* (Icma Green Book, 4<sup>th</sup> edition, 2012)
- NFPA 901: Standard Classifications for Fire and Emergency Services Incident Reporting and Fire Protection Data (current edition)
- NFPA 1030: Standard for Professional Qualifications for Fire Prevention Program Positions (current edition)
- NFPA 1730: Standard on Organization and Deployment of Fire Prevention Inspection and Code Enforcement, Plan Review, Investigation, and Public Education Operations (current edition)
- Application materials
  - Alternative compliance measure requests (Topic 2-10)
  - Complaints (Topic 2-11)

### Online Instructor Resources

The following instructor resources are available online at <https://osfm.fire.ca.gov/what-we-do/state-fire-training/professional-certifications>:

- None

### Student Resources

To participate in this course, students need:

- California Building Code (current edition)
- California Fire Code (current edition)
- NFPA 1030: Standard for Professional Qualifications for Fire Prevention Program Positions (current edition / physical or digital access)
- Application materials
  - Physical or digital access to their agency or department's local ordinances (Topic 2-2)
  - Physical or digital access to their agency or department's records-retention policy (Topic 2-7)
  - *Guide to Title 24* (<https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/Guidebooks---Title-24>) (Topic 2-13)

## **Facilities, Equipment, and Personnel**

### **Facilities**

The following facilities are required to deliver this course:

- Standard learning environment or facility, which may include:
  - Writing board or paper easel chart
  - Markers, erasers
  - Amplification devices
  - Projector and screen
  - Laptop or tablet with presentation or other viewing software
  - Internet access with appropriate broadband capabilities

## Time Table

Segment	Lecture	Application	Unit Total
<b>Unit 1: Introduction</b>			
Topic 1-1: Orientation and Administration	0.50	0.00	
Topic 1-2: Fire Marshal Certification Process	0.50	0.00	
<b>Unit 1 Totals</b>	<b>1.00</b>	<b>0.00</b>	<b>1.00</b>
<b>Unit 2: Managing Regulatory Programs</b>			
Topic 2-1: Regulatory Program Roles and Responsibilities	0.50	0.00	
Topic 2-2: Managing a Process for Adopting, Modifying, and Maintaining Codes, Standards, and AHJ Requirements	4.00	1.50	
Topic 2-3: Managing a Process for Conducting Compliance Inspections	6.00	0.00	
Topic 2-4: Managing a Plan Review Process	2.00	0.00	
Topic 2-5: Managing a Design Review Process	1.00	0.00	
Topic 2-6: Managing an Appeals Process	1.00	0.00	
Topic 2-7: Managing a Record-keeping Process	0.50	0.50	
Topic 2-8: Managing a Permit Process	1.50	0.00	
Topic 2-9: Managing a Compliance Interpretation Program	1.00	0.00	
Topic 2-10: Managing a Program for Alternative Compliance Measures	1.50	1.50	
Topic 2-11: Managing a Complaint Reconciliation Process	0.50	0.50	
Topic 2-12: Generating AHJ Requirements	0.50	0.00	
Topic 2-13: Managing an Interagency Coordination Program	0.50	1.50	
Topic 2-14: Bridging the Gap Between Operations and Prevention	1.00	0.00	
<b>Unit 2 Totals</b>	<b>21.50</b>	<b>5.50</b>	<b>27.00</b>
<b>Formative Assessments</b>			
Determined by AHJ or educational institution	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>Summative Assessment</b>			
Determined by AHJ or educational institution	<b>0.00</b>	<b>2.00</b>	<b>2.00</b>
<b>Course Totals</b>	<b>22.50</b>	<b>7.50</b>	<b>30.00</b>

## **Time Table Key**

1. The Time Table documents the amount of time estimated to deliver the content included in the course plan.
2. Time is documented using the quarter system: 15 min. = .25 / 30 min. = .50 / 45 min. = .75 / 60 min. = 1.0.
3. The Course Totals do not reflect time for lunch (1 hour) or breaks (10 minutes per each 50 minutes of instruction or assessment). It is the instructor's responsibility to add this time based on the course delivery schedule.
4. Application (activities, skills exercises, and formative testing) time will vary depending on the number of students enrolled. The Application time documented is based on the maximum class size identified in the Course Details section.
5. Summative Assessments are determined and scheduled by the authority having jurisdiction. These are not the written or psychomotor State Fire Training certification exams. These are in-class assessments to evaluate student progress and calculate course grades.

## **Unit 1: Introduction**

### **Topic 1-1: Orientation and Administration**

#### **Terminal Learning Objective**

At the end of this topic, a student will be able to identify facility and classroom requirements and identify course objectives, events, requirements, assignments, activities, skills exercises, resources, evaluation methods, and participation requirements in the course syllabus.

#### **Enabling Learning Objectives**

1. Identify facility requirements
  - Restroom locations
  - Food locations
  - Smoking locations
  - Emergency procedures
2. Identify classroom requirements
  - Start and end times
  - Breaks
  - Electronic device policies
  - Special needs and accommodations
  - Other requirements as applicable
3. Review course syllabus
  - Course objectives
  - Calendar of events
  - Course requirements
  - Student evaluation process
  - Assignments
  - Activities
  - Required student resources
  - Class participation requirements

#### **Discussion Questions**

1. Determined by instructor

#### **Application**

1. Determined by instructor

## Topic 1-2: Fire Marshal Certification Process

### Terminal Learning Objective

At the end of this topic a student will be able to identify the requirements for Fire Marshal certification and describe the certification task book and examination process.

### Enabling Learning Objectives

1. Identify the levels of certification in the Fire Marshal certification track
  - First Responder Inspector (formerly Inspector 2)
  - Fire Inspector (formerly Inspector 2)
  - Fire Plans Examiner (formerly Plan Examiner)
  - Fire Marshal
2. Identify the prerequisites for Fire Marshal certification
  - One of the following certifications:
    - ICC Fire Inspector 2 certification
    - OSFM Fire Inspector 2 (2014 or newer) **or** OSFM Fire Inspector (2024) **and** OSFM Plan Examiner (2015 or newer) **or** OSFM Fire Plans Examiner (2024)
3. Identify the course work required for Fire Marshal certification
  - Fire Marshal 1A: Administration and Professional Development (2024)
  - Fire Marshal 1B: Community Risk Reduction Planning and Management (2024)
  - Fire Marshal 1C: Fire Investigation Program Management (2024)
  - Fire Marshal 1D: Regulatory Program Management (2024)
  - Chief Fire Officer 3A: Human Resource Management for Chief Fire Officers (2014 or newer) **OR** Fire Officer 3A: Human Resource Management (2020)
  - Fire and Life Safety Educator (2019 or newer)
  - Statutes and Regulations (SFT)
  - G0290: Basic Public Information Officer Course (2016) **OR** L0105: Public Information Basics (2025) **OR** S-203: Introduction to Incident Information (CalEMA/Cal OES, CSTI, CDF/CAL FIRE, FEMA, FIREScope, NFA, NWCG, SFT) **OR** E/L0105: Public Information Basics (EMI, CSTI)
4. Identify the exams requirements for Fire Marshal certification
  - Not applicable
5. Identify the task book requirements for Fire Marshal certification
  - Fire Marshal Certification Task Book (2024)
6. Identify the experience requirements for Fire Marshal certification
  - Has a minimum of five (5) years' full-time paid experience or 10 years' volunteer or part-time paid experience in a recognized California fire agency with at least one (1) year full-time paid experience or two (2) years' volunteer or part-time paid time serving as a fire marshal
7. Identify the position requirements for Fire Marshal certification
  - None
8. Describe the certification task book process
9. Describe the certification testing process
  - Not applicable



- All formative and summative testing is completed in individual courses

**Discussion Questions**

1. Do you have any questions about the requirements for SFT Fire Marshal certification?

**Application**

1. Determined by instructor

## **Unit 2: Managing Regulatory Programs**

### **Topic 2-1: Regulatory Program Roles and Responsibilities**

#### **Terminal Learning Objective**

At the end of this topic a student, given an overview of the Fire Marshal's regulatory program roles, will be able to articulate the importance of regulatory programs as they relate to the fire service.

#### **Enabling Learning Objectives**

1. Identify the role of the Fire Marshal in regulatory programs, including:
  - Adopting the California Building Standards Code
  - Adopting and modifying codes and standards at the local level
    - Types: codes, standards, ordinances, resolutions
    - Timeframes
    - Considerations
  - Maintaining codes and standards at the local level
  - Developing and administering an inspection program
  - Developing and administering a plan review program
  - Managing appeals and alternate means of protection

#### **Discussion Questions**

1. What issues at the local level might require local ordinance adoption?
2. How does your agency interact with other municipal departments?
  - Is there any overlap?

#### **Application**

1. Determined by instructor

#### **Instructor Notes**

1. None

**CTS Guide Reference:** None

## **Topic 2-2: Managing a Process for Adopting, Modifying, and Maintaining Codes, Standards, and AHJ Requirements**

### **Terminal Learning Objective**

At the end of this topic a student, given fire loss data and/or a demonstrated need or deficiency, will be able to manage a process for the adoption, modification, and maintenance of codes, standards, and AHJ requirements so that the code, standard, or AHJ requirement is written and addresses the identified need or deficiency.

### **Enabling Learning Objectives**

1. Describe applicable AHJ requirements
2. Describe applicable legal and administrative processes in the AHJ for the adoption and modification of codes, standards, and AHJ requirements
3. Describe how to conduct statistical analysis
4. Describe the California Building Standards (CBS) code adoption process
  - Triennial code cycle
  - State agencies prepare amendments to model code
  - Submit amendments to California Building Standards Commission (CBSC)
  - 45-day public comment period and public hearings
  - CBSC approves amendments and forwards to publisher
  - Code becomes effective 180 days after publication
  - CBS code only applies to state-regulated occupancies and buildings
5. Describe the model codes and standards development process
  - When to adopt and modify codes at the local level
    - To apply CBS codes to non-state-regulated occupancies and buildings
    - To amend CBS codes at the local level
    - To create new codes at the local level (must meet state minimums)
    - Cannot modify code related to:
      - L occupancies
      - Public schools
      - Residential care facilities (six or fewer residents)
  - Considerations for adopting and modifying codes, standards, ordinances, or resolutions at the local level
    - Intent, purpose, and scope
    - Clearly defined, concise language
    - Geographic, topographic, climatic considerations for building standards modifications
    - Coordination with other inter- and intra-jurisdictional departments or agencies
    - Uniformity and consistency with state and regional groups and stakeholders
    - National Fire Incident Reporting System (NFIRS) fire loss data, local fire loss data, and origin and cause fire investigation reporting
    - Legal obligations, including:
      - Attorney General's Opinion, City of Pasadena (01-306)

- Attorney General's Opinion, Mendocino Fire Protection District (97-516)
    - Hall vs. City of Taft (1956)
    - Mission Development/Castle Construction vs. City of Vallejo (1994 / AB 2983 / HSC 18945(c))
    - Widmar vs. City of Marysville (1984 / HSC 13146.2)
    - Recent historic fires
      - Station Night Club fire (2003)
      - Ghostship fire (2016)
  - Adopting and modifying codes, standards, ordinances, or resolutions at the local level
    - Review agency's statutory authority
    - Establish facts and findings for building standards
      - California Building Standards only (HSC 17958.5)
      - Geographic, topographic, climatic reason for modification
      - Follow Administrative Procedures Act (5 U.S.C. 551) rule-making process
      - Draft language and adoptions resolution
      - Present to appropriate governing bodies
      - Public hearing process
        - In conjunction with counsel and clerk
        - Can vary by municipality
      - Formal adoption by governing bodies
      - Special districts amending CBS must have amendments ratified by impacted regions (town, city, etc.)
        - Region's governing body can further modify
      - Must file facts and findings and final amendment
        - Ordinance only takes effect after filing
        - CBSC for city departments
        - Housing and Community Development (HCD) for fire districts
      - Place into local code
      - Effective 30 days after final adoption/ratification by all governing bodies
  - Maintaining local codes, standards, ordinances, or resolutions
    - Erratum (minor updates to correct errors)
    - Revisions between formal code cycles
    - Emergency amendments
    - Removal if adopted at the state or national level
6. Describe identified facts, trends, and high-risk areas
  7. Apply the required knowledge to the organizational AHJ requirements
  8. Apply the required knowledge to the codes, standards, and AHJ requirements development and modification process
  9. Apply statistical analysis to a problem

**Discussion Questions**

1. What is the difference between legislation and regulation?
2. How can local AHJs participate in the California Building Standards code adoption process?
3. Why do local codes have to be adopted by ordinance every three years when the state amends the California codes?

**Application**

1. Using their own local ordinances, have each student identify one change they wish to make and develop a justification for that change.

**Instructor Notes**

1. None

**CTS Guide Reference:** CTS 6-1

## **Topic 2-3: Managing a Process for Conducting Compliance Inspections**

### **Terminal Learning Objective**

At the end of this topic a student, given applicable codes, standards, and AHJ requirements and/or an identified issue, will be able to manage a process for conducting compliance inspections so that the applicable codes, standards, and AHJ requirements are identified, deficiencies are documented, and compliance is determined.

### **Enabling Learning Objectives**

1. Identify inspection functions and programs
  - Maintenance
  - New construction
  - Weed abatement
  - Code enforcement
  - Complaints
  - Wildland urban interface
2. Identify applicable codes, standards, and AHJ requirements
3. Describe how to implement documents and methods
4. Describe technological tools to aid compliance inspections
5. Develop AHJ requirements for administering inspection functions and programs
6. Describe elements of an inspection program
  - Budget
  - Equipment and materials
  - Documentation
  - Staffing
  - Timeframes (turnaround time)
  - Workflow (process)
7. Describe considerations that go into developing an inspection program
  - Staff assignments (prevention bureau vs. engine company)
  - Geographical areas of responsibility
  - Occupancy-specific inspection types
  - Building-specific inspection types
  - Mandated vs. non-mandated inspections
  - Target hazards
  - Inspection frequency
  - Fire protection equipment and systems
  - New construction
  - Existing systems
  - Taskforce inspections
  - Logistics (engine parking, etc.)
  - Managing inspection outcomes
  - Fire watch (non-fire agency personnel)
  - Fire safety officer standby (fire agency personnel)
  - Political environment

8. Identify types of state-mandated inspections
  - Organized camps (HSC 18897.5)
  - High-rise (excluding hospitals) (HSC 13217)
  - Hotels, motels, and apartments (HSC 13146.2)
  - Jails and prisons (HSC 13146.1)
  - K-12 schools (HSC 13146.3)
9. Identify local agency responsibilities for inspections within limited statutory authority facilities
  - County (jails, facilities in municipality jurisdictions)
  - State (HSC 13108)
  - Federal (hazmat minus DOD / 42 USC 11022)
  - Other (sovereign nation)
  - Fairgrounds (owned by the state)
  - Specialized assembly occupancies
    - Wine caves
    - Fixed guideway transit systems (PUC General Order 164 (current version)) and stations (CBC/CFC)
10. Describe documents associated with an inspection program
  - Checklists
  - Citation notices
  - Inspection forms
  - Inspection reports
  - Permit forms
  - Referral forms
  - Notice and orders
  - Stop-work orders
  - Invoices
11. Describe process for developing an infraction, criminal, or administrative citation program
  - Identify the pros and cons using one program versus another to obtain desired outcomes
  - Identify appropriate procedures and requirements for program development
  - Develop the program
    - Adopt bail and fee schedules
    - Create relevant forms
  - Develop organizational policies and controls
  - Train personnel to implement
12. Identify inspection responsibilities related to the CAL FIRE STD 850 form
  - Health and Safety Code (HSC) 13235
13. Describe the three levels of involvement with the Certified Unified Program Agency (CUPA)
  - Full CUPA (manage all six CUPA programs)
    - Business Emergency Plans (BEP)

- California Fire Code HazMat (HMIS / HMMP)
    - Underground storage tanks (USTs)
    - Aboveground storage tanks (ASTs)
    - Hazardous Waste
    - CalARP (Accidental Release Program)
  - Participating agency (PA) (manage some, but not all, CUPA programs)
  - No CUPA involvement at all
    - Environmental Health manages CUPA
    - Fire prevention bureau still responsible for California Fire Code (CFC) enforcement and CFC permitting
14. Describe how to develop and administer an exterior hazard abatement program in the wildland urban interface
- Develop and adopt local ordinance language to enable an exterior hazard abatement program
  - Develop and administer an exterior hazard abatement program
    - Develop and maintain abatement standards
    - Issue legal notices
    - Complete compliance inspections
    - Note and document deficiencies
    - Follow up on abatement procedures
    - Issue work orders to have hazards abated by a third party

### **Discussion Questions**

1. How does your AHJ prioritize inspections?
2. How would you differentiate inspections assigned to an engine company from inspections assigned to a fire prevention bureau?
3. What are the implications of ignoring the requirement to inspect certain occupancies on an annual basis?
4. How can the fire marshal encourage consistency in field inspection code interpretations?
5. What are the pros and cons of inspection checklists?
6. What are the required components of a formal notice for due process?
7. When do local fire agencies have the authority to inspect hospitals and healthcare facilities?
8. What is the difference between a CUPA permit and a Fire Code permit?
9. Is a wildland urban interface always associated with a fire hazard severity zone?

### **Application**

1. Determined by instructor

### **Instructor Notes**

1. None

**CTS Guide Reference:** CTS 6-2



## **Topic 2-4: Managing a Plan Review Process**

### **Terminal Learning Objective**

At the end of this topic a student, given the policies of the AHJ requiring plan reviews, will be able to manage a process for enforcing the provisions of the codes, including plan reviews, rendering interpretations, and making code-compliant or organization-specific recommendations so that requirements for plan reviews are completed in accordance with AHJ policies.

### **Enabling Learning Objectives**

1. Identify applicable codes, standards, and AHJ requirements
2. Identify conditions of project approval
3. Describe AHJ workflow processes
  - Budget
  - Equipment and materials
  - Technological tools
  - Documentation
  - Staffing
  - Timeframes (turnaround time)
  - Workflow (process)
  - Workload demand
4. Describe technological tools for the plan review process
  - Data capture needs
  - Compatibility with other tools and programs
5. Develop AHJ requirements for administering plan review functions and program
6. Assign tasks
7. Describe how to manage a library of codes, standards, ordinances, and checklists required to perform an adequate plan review
  - Current codes, standards, ordinances, and checklists
  - Archives to access code edition in effect at time of a building's:
    - Project entitlement date
    - Plan review submittal date
    - Conditions of approval
    - Legal agreement
    - Tenant improvement
8. Describe how to review and approve policies and procedures for administering plan review functions
  - Third-party plan review services
  - Electronic plan review programs
  - Interagency coordination and record keeping
  - Design-build delivery models
  - Alternate means of protection
  - Performance-based design

**Discussion Questions**

1. What are the implications of failing to meet turnaround times?
2. Why is it important to have access to the codes that were in effect at the time a building was constructed?
3. Who has the authority to approve alternate methods of compliance/protection?

**Application**

1. Determined by instructor

**Instructor Notes**

1. None

**CTS Guide Reference:** CTS 6-4

## **Topic 2-5: Managing a Design Review Process**

### **Terminal Learning Objective**

At the end of this topic a student, given AHJ policies requiring design reviews, a General Plan, and a community risk analysis, will be able to manage a process for project design reviews so that project design review requirements are completed in accordance with AHJ policies.

### **Enabling Learning Objectives**

1. Identify design review stakeholders
  - Architect
  - Civil engineers
  - Residential neighbors
  - Developer
  - Community Development/Planning
2. Identify applicable statutes, codes, standards, and AHJ requirements
  - General plans
  - Environmental Impact Reports
  - Legislative limitations
3. Describe AHJ workflow processes
4. Identify reporting requirements
5. Identify special circumstances
  - Alternate means/methods/materials requests
  - Performance-based design considerations
6. Develop AHJ requirements for administering a design review process
7. Assign tasks

### **Discussion Questions**

1. What concerns can be addressed during project design review that would warrant a condition of approval?

### **Application**

1. Determined by instructor

### **Instructor Notes**

1. For ELO 2, be aware of things like the Permit Streamlining Act, ADU laws, AB-38, AB-130, SB-9, SB-131, etc.

**CTS Guide Reference:** CTS 6-3

## **Topic 2-6: Managing an Appeals Process**

### **Terminal Learning Objective**

At the end of this topic a student, given codes, standards, and AHJ requirements, will be able to manage an appeals process so that appeals can be resolved in compliance with the intent of applicable codes, standards, and AHJ requirements.

### **Enabling Learning Objectives**

1. Describe administrative and legal processes for managing appeals
2. Manage appeals in conformance with applicable codes, standards, and AHJ requirements
3. Describe appeals and their purpose
  - Authority: CCR Title 19, section 2.03
  - An application to a recognized authority for decision
  - An individual can appeal if they do not agree with an order, decision, or determination made by a fire official
  - Local regulation vs. State Fire Marshal regulation
4. Identify to which office one should submit appeals to orders, decisions, or determinations:
  - A non-state-regulated occupancy = local fire marshal office
  - A state-regulated occupancy or building = Office of the State Fire Marshal
  - A historic building = State Historical Buildings Safety Board
5. Describe how to develop and implement an appeals process
  - Establish administrative process
    - Equipment and materials
    - Documentation
    - Staffing
    - Timeframes (turnaround time)
    - Workflow (process)
  - Establish appeals board and/or identify members
  - Develop hearing procedures
  - Document a resolution
  - Address cost recovery

### **Discussion Questions**

1. What role might politics play in the appeals process?
  - What tactics might you use when facing political pressure on appeals?
2. Can the decision of the appeals board be appealed?
  - To whom can you appeal?

### **Application**

1. Determined by instructor

### **Instructor Notes**

1. None

**CTS Guide Reference:** CTS 6-5

## **Topic 2-7: Managing a Record-keeping Process**

### **Terminal Learning Objective**

At the end of this topic a student, given the need to document regulatory program processes, will be able to manage a process for record keeping so that there is a record of the regulatory actions.

### **Enabling Learning Objectives**

1. Describe AHJ regulatory record-keeping requirements
2. Identify archival requirements for different types of regulatory records
3. Manage regulatory records according to the applicable requirements
  - California Public Records Act
  - Intellectual property concerns

### **Discussion Questions**

1. How long do you need to keep occupancy inspection records?
2. How long do you need to keep plan review records?

### **Application**

1. Using their own records-retention policy, have students compare their policy to others' policies and note differences.

### **Instructor Notes**

1. None

**CTS Guide Reference:** CTS 6-6

## **Topic 2-8: Managing a Permit Process**

### **Terminal Learning Objective**

At the end of this topic a student, given applicable AHJ requirements, will be able to manage a process for administering, evaluating, and issuing permits, licenses, and/or certificates of fitness so that applicable codes, standards, and AHJ requirements are met.

### **Enabling Learning Objectives**

1. Describe legal processes for managing permits, licenses, and/or certificates of fitness
2. Manage permit applications in conformance with the applicable codes, standards, and AHJ requirements
3. Describe how to develop and administer a process to issue permits and certificates of occupancy
  - Establish administrative process
  - Staffing
  - Timeframes (turnaround time)
  - Workflow (process)
  - Cost recovery measures
4. Describe how to enforce permit regulations in accordance with AHJ policies applicable codes and standards
  - Issue permit
  - Conduct inspection
  - Cite violations
  - Assess penalties (including revocation)
  - Issue stop work orders

### **Discussion Questions**

1. How should you handle certificates of occupancies on projects with phased completion schedules?
2. Under what circumstances might you issue a stop work order?
  - How could it be lifted?

### **Application**

1. Determined by instructor

### **Instructor Notes**

1. None

**CTS Guide Reference:** CTS 6-7

## **Topic 2-9: Managing a Compliance Interpretation Program**

### **Terminal Learning Objective**

At the end of this topic a student, given complex issues related to codes, standards, and AHJ requirements, will be able to manage the compliance interpretation process for prescriptive codes, standards, and AHJ requirements, so that a resolution of the issue meets the intent of the prescriptive codes, standards, and AHJ requirements.

### **Enabling Learning Objectives**

1. Identify applicable codes, standards, and AHJ requirements
2. Identify who is responsible for the implementation of codes and standards within a city, county, or state
3. Identify code interpretation resources
  - International Code Council (ICC)
  - Office of the State Fire Marshal (OSFM)
  - National Fire Protection Association (NFPA)
  - Other standards organizations
4. Describe administrative and legal considerations of compliance interpretations
5. Describe interpretation and its purpose
  - Authority: California Building Code 104.1
  - A fire official's formal opinion of the application of a regulation
  - Uniform regulation application within a jurisdiction
6. Describe the interpretation and code clarification process
  - Consider using subject-matter experts
  - Determine intent of performance-based design
  - Research and define intent of prescriptive codes and standards
  - Develop interpretations
  - Provide access to interpretations
7. Evaluate prescriptive codes, standards, and AHJ requirements
8. Use verbal and written communication skills

### **Discussion Questions**

1. How would your AHJ handle challenges with complying with a formal interpretation from the Office of the State Fire Marshal or ICC?
2. Who is authorized to provide formal interpretation for a municipal ordinance at the local level?
3. For how long is a formal interpretation valid?
4. Who is responsible implementing codes within your AHJ? What are their qualifications?

### **Application**

1. Determined by instructor

### **Instructor Notes**

1. None

**CTS Guide Reference:** CTS 6-8

## **Topic 2-10: Managing an Alternative Means/Methods/Materials Measures Program**

### **Terminal Learning Objective**

At the end of this topic, a student, given the submittal of equivalencies, alternative methods, and performance-based design, will be able to manage a program for alternative means/methods/materials measures so that the final design meets the intent of the codes, standards, and AHJ requirements.

### **Enabling Learning Objectives**

1. Identify codes, standards, and AHJ requirements
2. Identify alternative means/methods/materials measures evaluation resources
  - International Code Council Evaluation Services (ICC-ES)
  - Office of the State Fire Marshal (OSFM)
  - NFPA 550: Guide to the Fire Safety Concepts Tree
  - Other standards organizations
  - Fire modeling
3. Describe administrative and legal considerations of equivalencies, alternative methods, and performance-based design
4. Describe evaluative programs for objective analysis of alternative means/methods/materials measures
5. Describe technological solutions for alternative means/methods/materials measures
6. Evaluate and verify validity of nonprescriptive design approaches
7. Develop AHJ requirements for administering alternative means/methods/materials measures programs
8. Describe alternative means/methods/materials methods and their purpose
  - Authority
    - California Building Code 104.9 (2025)
    - Title 19 California Code of Regulations (CCR), Div. 1, Chapter 1, (1), Article 2
  - Installation of any material or any design or method of construction not specifically prescribed by code
  - Allowing new materials, methods, or technologies
  - Examining proposed alternatives from a performance-based standpoint
9. Describe how to develop a jurisdictional process for alternative means/methods/materials methods
  - Consider using design professional peer review
  - Consider using of subject-matter experts
  - Request research reports or specialized tests
  - Recognize practical difficulties
  - Review alternate methods and materials
  - Determine equivalency with prescriptive code
  - Recover costs



**Discussion Questions**

1. How does the approval of an alternative means/methods/materials request set a precedent for future project?
2. For how long is an alternative means/methods/materials approval valid?

**Application**

1. Given three to five alternative means/methods/materials requests, have students determine which ones they would approve and reject, and why.

**Instructor Notes**

1. Develop the application scenarios.

**CTS Guide Reference:** CTS 6-9

## **Topic 2-11: Managing a Complaint Reconciliation Process**

### **Terminal Learning Objective**

At the end of this topic a student, given the report of a situation or condition, will be able to manage the process for reconciling complaints so that complaints are resolved and appropriate action is taken.

### **Enabling Learning Objectives**

1. Identify applicable codes, standards, and AHJ requirements
2. Describe administrative and legal considerations for management and resolving complaints
  - Create policies and procedures
  - Develop a method for evaluating complaints
  - Develop forms and tracking systems
  - Establish a referral process to other agencies or departments
  - Establish methods for resolving complaints
  - Document referral or resolution
3. Evaluate and resolve complaints using appropriate legal and administrative requirements

### **Discussion Questions**

1. Is a Fire Marshal required to address an anonymous complaint?
2. How does your fire prevention bureau process and track hazard complaints?
3. What criteria does your fire prevention bureau use to prioritize complaints?
4. What criteria does your fire prevention bureau use to validate complaint?

### **Application**

1. Given eight to 10 complaints, have students prioritize the order in which they would address them and why.

### **Instructor Notes**

1. Develop the application complaints.

**CTS Guide Reference:** CTS 6-10

## **Topic 2-12: Generating AHJ Requirements**

### **Terminal Learning Objective**

At the end of this topic a student, given management objectives, will be able to generate AHJ requirements for administering a regulatory management program so that the requirements are defined, concise, and in accordance with the legal obligations of the AHJ.

### **Enabling Learning Objectives**

1. Describe AHJ requirements and management objectives for the regulatory management program
2. Identify resources used to generate AHJ requirements
3. Interpret AHJ requirements
4. Write AHJ requirements in accordance with administrative and legal guidelines

### **Discussion Questions**

1. Determined by instructor

### **Application**

1. Determined by instructor

### **Instructor Notes**

1. ELO 1 and 2 were addressed throughout Unit 2: Regulatory Programs. Focus on ELO 3 and 4.

**CTS Guide Reference:** CTS 6-11

## **Topic 2-13: Managing an Interagency Coordination Program**

### **Terminal Learning Objective**

At the end of this topic a student, given other agencies' requirements that overlap the local AHJ' requirements, will be able to manage a program to coordinate with other agencies so that conflicts are eliminated and clear lines of responsibility are developed.

### **Enabling Learning Objectives**

1. Identify other regulatory agencies that affect the local AHJ
  - Administrative Office of Courts (AOC)
  - Board of State and Community Corrections (BSCC)
  - Building Standards Commission (BSC)
  - California Energy Commission
  - Department of Consumer Affairs (CA)
  - Department of Fish and Game
  - Department of Food and Agriculture (AGR)
  - Department of Public Health
  - Department of Water Resources
  - Division of the State Architect
  - Housing and Community Development (HCD)
  - Local agencies
  - Occupational Safety and Health Administration (OSHA)
  - Office of Statewide Health Planning and Development (OSHPD)
  - Public Utilities Commission (PUC)
  - State Lands Commission
  - State libraries
  - University of California (UC)
  - Water districts
2. Identify administrative and legal authorities pertaining to the program
3. Describe record-keeping requirements of other agencies
  - Impacts how Fire Marshal completes paperwork to meet other agency requirements
4. Describe procedures for administering a program to coordinate with other agencies
  - Develop memoranda of understanding between agencies (if applicable)
  - Recognize and research jurisdictional limitations
  - Research other agencies' jurisdictional responsibilities
5. Evaluate other regulatory agencies' requirements
6. Negotiate and resolve conflicts

### **Discussion Questions**

1. What is the Fire Marshal's role when dealing with other regulatory agencies?
2. For what purpose, or under what type of circumstances, might a fire prevention bureau enter into a formal agreement with another agency or organization?

### **Application**

1. Use the activities in *Guide to Title 24*.

**Instructor Notes**

1. For ELO 1, use *Guide to Title 24* as published by the State Building Standards Commission.

**CTS Guide Reference:** CTS 6-12

## **Topic 2-14: Bridging the Gap Between Operations and Prevention**

### **Terminal Learning Objective**

At the end of this topic a student, given the discretionary authority granted to the jurisdiction in the codes, standards, and jurisdictional requirements, will be able to utilize the concepts of fire department emergency operations and firefighter safety so that fire department emergency operations and firefighter safety are considered.

### **Enabling Learning Objectives**

1. Describe basics of fire department fireground operations
2. Describe strategy and tactics
3. Describe apparatus placement on a fireground
4. Describe water supply operations
5. Describe how using Incident Command System principles impacts prevention activities
6. Apply the discretionary authority granted to the jurisdiction in the codes, standards, and jurisdictional requirements in a manner that incorporates considerations for fire department operations and firefighter safety

### **Discussion Questions**

1. Why is it relevant for a Fire Marshal to understand fireground operations?

### **Application**

1. Determined by instructor

### **Instructor Notes**

1. Spending time with your training chief, observing operations teams, and reviewing policies and procedures will strengthen this topic.

**CTS Guide Reference:** CTS 6-13

## How to Read a Course Plan

A course plan identifies the details, logistics, resources, and training and education content for an individual course. Whenever possible, course content is directly tied to a national or state standard. SFT uses the course plan as the training and education standard for an individual course. Individuals at fire agencies, academies, and community colleges use course plans to obtain their institution's consent to offer course and provide credit for their completion. Instructors use course plans to develop syllabi and lesson plans for course delivery.

### Course Details

The Course Details segment identifies the logistical information required for planning, scheduling, and delivering a course.

### Required Resources

The Required Resources segment identifies the resources, equipment, facilities, and personnel required to deliver the course.

### Unit

Each Unit represents a collection of aligned topics. Unit 1 is the same for all SFT courses. An instructor is not required to repeat Unit 1 when teaching multiple courses within a single instructional period or academy.

### Topics

Each Topic documents a single Terminal Learning Objective and the instructional activities that support it.

### Terminal Learning Objective

A Terminal Learning Objective (TLO) states the instructor's expectations of student performance at the end of a specific lesson or unit. Each TLO includes a task (what the student must be able to do), a condition (the setting and supplies needed), and a standard (how well or to whose specifications the task must be performed). TLOs target the performance required when students are evaluated, not what they will do as part of the course.

### Enabling Learning Objectives

The Enabling Learning Objectives (ELO) specify a detailed sequence of student activities that make up the instructional content of a lesson plan. ELOs cover the cognitive, affective, and psychomotor skills students must master to complete the TLO.

### Discussion Questions

The Discussion Questions are designed to guide students into a topic or to enhance their understanding of a topic. Instructors may add to or adjust the questions to suit their students.

**Application**

The Application segment documents experiences that enable students to apply lecture content through cognitive and psychomotor activities, skills exercises, and formative testing. Application experiences included in the course plan are required. Instructors may add additional application experiences to suit their student population if time permits.

**Instructor Notes**

The Instructor Notes segment documents suggestions and resources to enhance an instructor's ability to teach a specific topic.

**CTS Guide Reference**

The CTS Guide Reference segment documents the standard(s) from the corresponding Certification Training Standard Guide upon which each topic within the course is based. This segment is eliminated if the course is not based on a standard.

**Skill Sheet**

The Skill Sheet segment documents the skill sheet that tests the content contained within the topic. This segment is eliminated if the course does not have skill sheets.