

1222 S. MICHIGAN STREET  
SOUTH BEND, INDIANA 46601-2821



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CITY OF SOUTH BEND JAMES MUELLER, MAYOR  
SOUTH BEND FIRE DEPARTMENT

CARL R. BUCHANON  
FIRE CHIEF

10/9/2024

**Board of Firefighting Personnel Standards and Education**

Indiana Department of Homeland Security  
302 W. Washington Street, Room E208  
Indianapolis, IN 46204

Dear Board Members,

I am seeking clarification and guidance from the Board of Firefighting Personnel Standards and Education regarding the interpretation and application of specific sections within **655 IAC 2-2-1** and **655 IAC 4-3**, which pertain to the certification requirements for firefighting personnel in Indiana.

**1. Certification Requirements for Firefighters and Related Emergency Services:**

Section **655 IAC 2-2-1** outlines that individuals performing firefighting or related emergency services must be certified by the Board. We understand that this includes firefighters actively responding to emergency incidents. Could you confirm whether this interpretation extends to all emergency services personnel, including those specializing in technical rescue?

Specifically, we would appreciate confirmation on whether individuals conducting technical rescues are required to hold certification as outlined in **655 IAC 4-3 (Operations Levels and Technician Levels)**. Does the Board's certification apply universally to all responders in these specialized roles, regardless of their primary assignment within the fire department?

**2. Incident Commanders or Acting Incident Commanders:**

Additionally, **655 IAC 4-3-33** specifies that individuals acting in the capacity of **Incident Commander** must be certified in **Fire Officer – Strategy and Tactics**. However, there is some ambiguity regarding whether Incident Commanders or those acting in this role must also be certified as **Fire Officer I**. As the **Fire Officer I** certification includes competencies beyond fireground command, such as administrative leadership, it seems that **Fire Officer – Strategy and Tactics** alone may be sufficient for Incident Commanders who are not performing the full range of Fire Officer I responsibilities.

Could the Board provide guidance on whether **Fire Officer – Strategy and Tactics** certification alone suffices for individuals serving as Incident Commanders, or if **Fire Officer I** certification is also required, even if they are not performing the administrative or leadership tasks outlined in the **Fire Officer I** curriculum?

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### 3. Driver/Operators of Aerial and Pumper Apparatus:

Firefighters acting as **Driver/Operators** for aerial and pumper apparatus are subject to certification requirements as specified in **655 IAC 4-3-3 (Driver/Operator-General)**, **655 IAC 4-3-4 (Driver/Operator-Pumper)**, and **655 IAC 4-3-5 (Driver/Operator-Aerial)**.

Our question is whether these certifications suffice for individuals operating as **Driver/Operators** without additional certifications in **Firefighter II** or other advanced firefighting roles. In other words, can an individual certified in **Driver/Operator-Aerial** or **Driver/Operator-Pumper** operate those apparatus independently, or are they required to also maintain a broader firefighter certification beyond the scope of **Driver/Operator** roles?

Clarification on this matter would help us ensure compliance and appropriate certification levels for personnel who primarily serve as operators of specialized firefighting apparatus.

### Request for Clarification:

Given the complexity of certification requirements outlined in both **655 IAC 2-2-1** and **655 IAC 4-3**, we kindly request the Board's formal guidance regarding the above questions. Our goal is to ensure compliance with the laws and administrative codes governing the training and certification of our personnel while maintaining the highest standard of operational readiness and safety within our department.

We value the Board's expertise and appreciate any clarification or further intent that you can provide regarding these matters. Should you require additional information or would like to discuss this matter further, please feel free to contact me directly at **574-235-9310** or **broark@southbendin.gov**.

Thank you for your time and consideration of this request. I look forward to your response and continued collaboration.

Sincerely,

**Brandon Roark**

Assistant Chief of Training and Development  
South Bend Fire Department

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