

**THE DEVELOPMENT OF A PROCESS TO ESTABLISH WRITTEN STANDARD
OPERATING PROCEDURES AND/OR STANDARD OPERATING GUIDELINES
FOR THE WELLESLEY FIRE DEPARTMENT**

EXECUTIVE DEVELOPMENT

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Abstract

The problem was that the Wellesley Fire Department (WFD) did not have a process for establishing written Standard Operating Procedures (SOPs) and Standard Operating Guidelines (SOGs). The purpose of this research project was to develop a process for establishing written SOPs and/or SOGs for the WFD and an organizing system. This project was conducted using the action research method.

The following research questions were posed: 1. What process exists for establishing written standard operating procedures and guidelines? 2. What is the process for establishing written standard operating procedures and guidelines in comparable departments in Massachusetts? 3. What are the benefits of establishing written standard operating procedures and guidelines? 4. What are the legal implications of establishing written standard operating procedures and guidelines?

The procedure used involved a review of current literature to gather information on the research questions. Additionally, a feedback form was sent to comparable departments to evaluate their methods, and a questionnaire was sent to three attorneys seeking a legal perspective of SOPs and SOGs.

The results of this research project included the writing of WFD's initial SOP, which provided a system for the structure and content of an SOP and an SOP manual. The most common standard for establishment of written SOPs is the National Fire Protection Association (NFPA), *NFPA 1500, Standard on Fire Department Health and Safety Program 2002 Edition*, (NFPA 1500) and *NFPA 1561, Standard on Emergency Services Incident Management System, 2002 Edition*, (NFPA 1561). The Chief of the WFD signed a

General Order, authorizing the results of this research as the procedure to establish and organize SOPs in the WFD.

It was the recommendation of the researcher that the WFD continue in the future to implement and review SOPs as an ongoing process of organizational professional development.

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Introduction

The problem is that the Fire Department in the Town of Wellesley, Massachusetts does not have a process for establishing written standard operating procedures and guidelines. The purpose of this research project is to develop a process for establishing written standard operating procedures and guidelines for the Wellesley Fire Department. This is an action research project. The research questions are:

1. What process exists for establishing written standard operating procedures and guidelines?
2. What is the process for establishing written standard operating procedures and guidelines in comparable departments in Massachusetts?
3. What are the benefits of establishing written standard operating procedures and guidelines?
4. What are the legal implications of establishing written standard operating procedures and guidelines?

Background and Significance

In the past and including the present the Chief of the Wellesley Fire Department would issue a “ General Order” which is a written, numbered directive that creates or alters a department rule and policy. The general order outlines or states an objective but doesn’t provide a detailed guide to achieve the intended result. The problem of limited details is the different interpretations of the steps needed to achieve the intended result. The variety of practices used to achieve the same objective inhibits personnel from different shifts working together in the most efficient and safe manner.

At the present the Wellesley Fire Department (WFD) does not have written standard operating procedures (SOPs) or standard operating guidelines (SOGs). After a conversation with the Training Captain of the WFD (Personal Communication, Oct 7, 2002), it was concluded that current methods of operations by fire department personnel on all four shifts are not uniform, as various operations are conducted differently based on the preference of the shift commander. The lack of standard procedures and guidelines thru out the entire organization results in confusion between personnel who are working overtime or are transferred to another shift. There is great potential for disaster when there are no set uniform practices that are understood by all participating personnel.

There is interest from the Chief Kevin Rooney, Deputy Chief Richard DeLorie and Training Officer, Captain James Dennehy (Personal communication, Oct 7, 2002), in establishing written standard operating procedures and guidelines to develop continuity in the department's operations. There is interest among the department leadership in establishing written SOPs and SOGs, which will link directly to training modules, when applicable.

This study is important to the WFD for several reasons. This research will provide information necessary to develop a process of establishing written SOPs and SOGs. This research will identify the benefits of written SOPs and SOGs. This research will identify the legal implications of establishing written SOPs and SOGs. It is anticipated that the findings of this research will become the basis for establishing written SOPs and SOGs for the WFD. Furthermore, this research will completed to add

to the body of knowledge available for other departments to evaluate the process of establishing SOPs and SOGs, to observe the operational benefits, and the legal implications of establishing SOPs and SOGs.

This Applied Research Project (ARP) relates to the Legal Issues Unit # 11 taught at the National Fire Academy (NFA) in the Executive Development (ED) Course. This section of the EFO class was taught by, Professor Vincent Brannigan. The unit involves the understanding of basic legal concepts considering the personal and organizational implications of decisions affecting fire service operations. This unit reviews fire service policies and procedures that can help minimize personal and professional liability (NFA, 2000).

This research project relates to United States Fire Administration Operational Objective, "Reduce the loss of life from fire of firefighters", by establishing written standard operating procedures and guidelines to establish continuity in operations (NFA, 2002).

Literature Review

The NFA's Learning Resource Center (LRC) was the primary source of research material. The purpose of this literature review is to review relevant information on the process for establishing written SOPs and SOGs. This research additionally evaluates the process for establishing SOPs and SOGs in comparable departments in Massachusetts, to identify the benefits of establishing written SOPs and evaluating the legal implications of establishing written SOPs.

The preeminent organization for the development of SOPs in the fire service is the NFPA. There are two NFPA standards that were reviewed to consider the development of written standard operating procedures.

The first NFPA standard reviewed is identified as NFPA 1500. This edition of NFPA 1500 was approved as an American National Standard on January 31, 2002. The purpose of this standard shall be to specify the minimum requirements for an occupational safety and health program for fire departments (NFPA, 2002a). The NFPA 1500 standard establishes the requirements for a fire department occupational safety and health programs. The benefits of establishing written operating procedures and guidelines are clearly explained in the origin and development of this standard. NFPA 1500 references many other organizations and NFPA standards to provide the supporting information to be considered when implementing this standard.

NFPA 1500 states that, the fire department shall prepare and maintain written policies and standard operating procedures and guidelines that document the organization structure, membership, roles and responsibilities, expected functions, and training requirements, including the following:

- 1) The types of standard evolutions that are expected to be performed and the evolutions that must be performed simultaneously or in sequence for different types of situations.
- 2) The minimum number of members who are required to perform each function or evolution and the manner in which the function is to be performed.
- 3) The number and types of apparatus and the number of personnel that will be dispatched to different types of incidents.

- 4) The procedures that will be employed to initiate and manage operations at the scene of an emergency incident (NFPA, 2002b).

NFPA provides for a phase in schedule for the implementation and compliance of the 1500 standard as stated in section 1.5 Adoption requirements. The authority having jurisdiction shall be permitted to approve an equivalent level of qualifications for the requirements specified in chapter 5 of this standard (NFPA, 2002c).

In summary, the research noted the value of the written standards that exist in the NFPA 1500. It was easy to identify the positive results from establishing written standards and the impact upon the safety and performance of the fire department operations.

The NFPA 1561; Standard on Emergency Services Incident Management system, 2002 Edition. The scope of this standard contains the minimum requirements for an incident management system to be used by emergency services to manage all emergency incidents (NFPA, 2002d). The purpose of this standard shall be to define and describe the essential elements of an incident management system (NFPA, 2002e). The NFPA 1561 standard provides the requirements to establish emergency services incident management system and provides a process to develop written standards to establish an incident management system. The purpose of an incident management system shall be to provide structure and coordination to management of emergency incident operations, in order to provide for the safety and health of emergency services organization personnel and other persons involved in those activities (NFPA, 2002f).

In summary, the information obtained from NFPA 1561 establishes the necessity to adopt/establish written SOPs and the process to implement the concepts of this

standard to increase the safety of fire personnel. The standard displays the benefits of the standardization of a process to increase safety and effectiveness of operations. The NFPA standard influenced the research by supporting the need for a written incident management system that will result in increased safety.

The author, Knapp defines an SOP as a written description of how your department is going to operate and establishes the benefits of establishing written SOPs. With written SOPs in place, it takes more than a whim to change the basic operations. It takes writing new SOPs, staffing it, and retraining the firefighters. Written SOPs stop senseless change by new officers, but allow for well thought out improvements in policy and procedures... SOPs are a great way to protect members by learning from other departments' tragedies...Our SOPs should be based on years, maybe even centuries, of firefighting experience by us, and all firefighters. Every department cannot afford to make every mistake (Knapp, 1999, p9).

In summary the author of this article provides a process of writing, maintaining SOPs and explaining the values of SOPs. The research noted the value of the information on SOPs in the article and the encouragement to learn what other departments use for SOPs. The article addresses the process and benefits of establishing SOPs in the fire service. This article provides a process of writing and maintaining SOPs.

Parkers *article, " Building a Safety Culture"*, identifies the following components of NFPA 1500 as the basis of a fire departments health and safety program:

- A model fire department organizational structure

- Firefighter training requirements
- Protective clothing and equipment requirements
- Fire apparatus design and purchasing guidelines
- Emergency operations requirements
- Firefighter medical and physical requirements
- Facility safety requirements
- Employee assistance program requirements
- A critical incident stress management program

The benefits and methods of building values in an organization to carry out SOPs are outlined in this work. This article discusses the process of establishing SOPs and developing a “Cult of Safety”.

The author states the need to have the essential components to develop an organizational culture focused on safety. The following are the essential components, which include, support from departmental leadership, support from the rank and file, training to change attitudes, effective use of the incident command system, and appointment and support of safety officers. The written SOPs must reflect the values of the organization and establish continuity in operations (Parker, 2002).

In summary, the author of this article emphasizes the use of NFPA 1500 as the basis of a health and safety program. NFPA 1500 states the need to have established SOPs. The organizational benefits are outlined as developing a culture of safety. The participation by all interests within the organization is significant to the overall benefits to department operations. This article influenced the research by supporting the benefits of SOPs and the components needed to institute successful procedures.

Chief Brunaciani, discusses the issue of reducing legal risks of a fire department. The first aspect is to use a standard management model for quality control, which is in short a standard response to a particular problem to produce an expected outcome. He emphasizes following a plans that are established by people who have the best information and knowledge of how to conduct a particular procedure. He states following written procedures is the best, effective way, to avoid a lot of legal confusion. The standard operating procedures should be based upon national models and become part of the standard of care in our business.

Having standard operating procedures in place is not enough; the need to review and critique on a regular basis is critical. Having lawyers review and understand your methods of operation, enables them to provide you with the best possible risk reduction advice, as the average lawyer knows little of fire department operations (Brunacini, 1992).

In summary, the author clearly explains that there is no way to hide from risk, but certainly the methods that he has previously pointed out will assist in limiting your legal responsibilities. The information contained in the article assisted in addressing the research questions 1, 3 & 4 which were: What process exists for establishing standard operating procedures? What are the benefits of establishing standard operating procedures? And what are the legal implications of establishing written standard operating procedures? The findings of this article influenced this project by illustrating the importance of establishing nationally accepted standards, reviewing them in a timely fashion, and the legal implications that can result from the quality of your SOP program.

Nicholson states that following safety procedures can help reduce a fire departments liability. The major issue discussed in this article is the fact that SOPs must be more than written procedures, but need to be enforced by the department. He states that the courts will hold the department to the procedures that exist and you have got to comply with them. The article addresses the legal implications of SOPs and the benefits that maintaining and enforcing SOPs can protect your department. The information within the article stresses the value of SOPs and what they should be based upon real applications on a regular basis (Nicholson, 2002).

This article influenced the research by providing the legal and operational benefits of written SOPs. The importance of enforcing the SOPs is emphasized.

The Emergency Management Institute (EMI) student manual for the Emergency Operations Center course provided information on the benefits of using SOPs. The manual provides a definition of SOPs as a written document of validated procedures. SOPs need to be available as reference material and can serve as a training tool (Emergency Management Institute, 1995).

This EMI Manual assisted the research by providing an example of how to develop SOPs. It demonstrates the value of SOPs as an emergency reference tools and an activity coordinating mechanism.

The authors Heimlich and Dresbach define standard operating procedures as the day-to-day activities within the boundaries set by the organization. As written documents, continuity is maintained for the duration and leadership succession of the organization. When it has written documents and there is common knowledge of the procedures, the organization will be protected from itself. The issue of all members

having access to a copy of the duties of each person and describes the limitations of the officers as well (Heimlich and Dresbach, 2002).

Heimlich and Dresbach provided this research project with continued support for the value of SOPs, to define the operations and duties of members of in an organization. This article provided methods for the development of SOPs, such as brainstorming as a process to establish SOPs' suited to your organization.

Carter and Rausch provide a definition of SOPs; simply stating that SOPs specify how certain tasks should be performed. They identify the need for SOPs for both emergency and non-emergency functions. To be most useful, emergency procedures should be flexible enough to allow firefighters to react to different situations and incremental to permit the adjustment to the scale of the incident. Developing a strategy for an emergency requires the same steps used in reaching any other decision: Define the problem and obtain the data, identify useful alternative courses of action, select the alternative that is best for a given situation, and consider the probabilities of unforeseeable events, as this is an ongoing form of risk management (Carter, Harry and Rausch, Erwin, 1999).

The information provided by this book assisted the research in clearly underscoring the value of SOPs as problem solving tools to reoccurring events. The author presents the need to provide consistent guidance, demonstrating the value of SOPs as a method to achieve goals. The development of a decision-making tool can be fairly rigid as a SOP or more flexible as an SOG.

The author Cook's work provides a template on which a fire department can base its own manual or procedures. The author provides an extensive definition of

terms and justification for having SOPs. Rules and procedures are discussed, how and why they should be promulgated. The author identifies a written SOP as the structure that makes a department more professional. He outlines the modification or adaptation of SOPs to suit the needs of your department's operations. The SOPs need to be clear, concise and most importantly followed. An SOP that management doesn't enforce isn't a true SOP. Enforcement should be educational, providing the opportunity for positive rather than negative reinforcement. If a SOP is impossible to enforce something has to change-the organization, its leadership, or the policy. The author also discusses various litigation issues surrounding the development, writing and implementation of SOPs. He discusses the issue of how a SOP is written in mandatory permissive terms such as shall, will, should and may, can have dramatic litigation results. This author cites several significant NFPA standards in the context of SOP and SOG development (Cook, 1998).

In summary this book provided the researcher with support by concurring with prior literary reviews on the significance of nationally based SOPs, that are written, enforced and that are adjusted to suit the needs of an individual department's operation(s). The litigation issues discussed in this work will need to be further researched before the value can be determined at this time.

Writing in the, *Fire Protection Handbook 18th Ed*, Paulsgrove (1997) addresses the importance of having written SOPs. The author states, " every fire department should have a set of rules and regulations that outline performance expectations for its members, standard operating procedures for the department and disciplinary actions that may be taken for failure to follow the regulations"(p.10). In the section identified as

Fire Department Administration and Operations, the value and need for standard operating procedures are identified as measures to establish consistent approaches to control operations (Paulsgrove, 1997).

The *Fire Protection Handbook 18th Ed.*, supports the value of standard operating procedures as identified by the literature review conducted to this point in the research project.

Procedures

The purpose of this project is to develop the criteria for establishing written SOPs and/or SOGs for the WFD. Action research methodologies will be employed to help guide the project to find answers to the research questions. The research will result in the establishment of written SOPs and/or SOGs for the Town of Wellesley Fire Department.

Research and data collection is beginning with a literature review at the National Fire Academy's (NFA) Learning Resources Center (LRC) in September 2002. Journals, professional fire service standards, National Fire Academy course manuals, Federal Emergency Management Agency (FEMA) course manuals, health and safety articles and various books written on the subject of standard operating procedures and guidelines will be reviewed.

The criteria to focus the research project literature review will be, first the information needs to be relevant to the subject and research project purpose. Second, the information should to be current as possible. Third, if the research identifies standards or methods of operating, the researcher will make every effort to be consistent with professionally recognized fire service standards or explain any variation

from an accepted standard. This research paper will be written according to the *Publication Manual of the American Psychological Association 5th Edition* (APA).

Feedback Form

The research will include a feedback form (Appendix B). The feedback was developed to gather information to answer the following questions:

1. What process exists for establishing written standard operating procedures and guidelines?
2. What is the process for establishing written standard operating procedures and guidelines in comparable departments in Massachusetts?
3. What are the benefits of establishing written standard operating procedures and guidelines?
4. What are the legal implications of establishing written standard operating procedures and guidelines?

A cover letter (Appendix A) was sent to the Chiefs/departments of 13 comparable communities to introduce and explain the feedback form (Appendix C).

Population

The 13 comparable communities chosen represent 100% of comparable communities used by the Town of Wellesley Human Resources Department and the Town of Wellesley Firefighters Union during labor negotiations. The responses from these communities will then be analyzed to understand how other departments develop, and use SOPs or SOGs. Descriptive statistics were used to calculate and interpret the data generated from the feedback form. Specifically, the raw number and percentages are provided in (Appendix D).

Assumptions

The author, for the purposes of this research, assumed that the responses given by those responding to the feedback form were complete and honest. The author assumed that the individuals of the organizations that responded to the various questions on the feedback form, did so with the goal of providing information that will improve the understanding and value of SOPs and/or SOGs in the fire service.

Finally, it is assumed by the author that although no other formal method of analysis was found during the research, for the comparison of SOP/SOG programs in comparable communities, the methods used by the author still provide significant data that can be accurately used to answer the research questions.

Limitations

The author recognizes several limitations with this research. First, as with any applied research project, the limited time period of six months inhibits a more detailed and expanded research paper. There is a great deal of reference information available to the researcher on the topics of SOPs and SOGs thus limiting the ability to review all related materials. However, the researcher will make every effort to select materials that will answer the research questions and provide the end product of a written SOP/SOG program for the Town of Wellesley Fire Department.

The author realizes that the feedback form distributed to the other fire departments, (Appendix C) itself is a limited inquiry. A great deal of thought went into the design of the feedback form in order to be simple and straightforward. The author also recognizes the demands upon the time of other Fire Chiefs and will be respectful in developing a feedback form that will take only a limited amount of their

time to complete. Lastly, the author also recognizes that the use of SOPs and/or SOGs remains a controversial topic in regards to their development, design, operational benefit and legal liabilities. It is therefore recognized the limited population sample will be selected to solve the SOG/SOP issue with respect to the WFD.

Questionnaires

A questionnaire (Appendix E) will be sent to three attorneys regarding the differences between SOPs and SOGs from a legal their perspective with regards to departmental liability. The authors questionnaire will involve three attorneys that will include the Town Wellesley's Legal Council, Mr. Albert Robinson, and Legal Council for International Association of Firefighters Local 1795, Mr. Dennis Brown, and Professor Vincent Brannigan Jr.

Definition of Terms:

1. Standard Operating Procedures – A written statement of procedures designed to standardize general activities, stating what shall and will be done at a given activity.
2. General Order – A written, numbered directive that changes a department's rules, regulations, policies, or standard operating procedures. In most fire departments, the Fire Chief issues general orders, as well as SOPs.
3. Standard Operating Guidelines – A written statement of procedures that allows for greater flexibility advising what should be done but allowing for adaptability to a given activity.
4. Chief of Department – The legal head of the Fire Department having the authority over departmental operations.

5. Learning Resource Center -(LRC) Located in Emmitsburg, Maryland and is the library for the National Fire Academy, Emergency Management Institute and for other programs conducted the Federal Emergency Management Agency. A collection of over 100,000 books magazines, and audiovisual materials, the LRC facilitates and supports student and faculty research and curriculum development and design. For more information call 1-800-638-1821; or visit their web site at www.lrc.fema.gov.
6. Comparable Departments - This is a historical list of communities used by the Town of Wellesley Human Resources Board for comparison purposes during collective bargain negotiations.

Results

The results for this applied research project were compiled utilizing the feedback form (Appendix B) from the 13 comparable communities (Appendix C). This feedback form was distributed to the 13 comparable communities distribution represented: 100% of the comparable departments used by the Town of Wellesley and the Wellesley Firefighters Union during labor negotiations. A total of 13 feedback forms were distributed. A total of 13 were completed and returned. This equates to a return rate of 100 percent.

Additionally, the questionnaires distributed to several attorneys representing labor, management and a third with no vested interest in either labor or management. An explanation of the research and a request for their legal perspective was distributed in a letter (Appendix E). A total of three legal opinions were solicited and out of that number 100% responded. The responding attorneys' letters are copied in their entirety

in (Appendices F, G and H). The unique individual attorneys responses would only be available to other researchers in the Appendix of the project, so it was the decision of the researcher to include in their entirety. (Appendix F) is the response received from Attorney/Professor Brannigan. (Appendix G) contains the response from Attorney Albert Robinson. Lastly, (Appendix H) contains the response from Attorney Dennis Brown.

In answer to the specific research questions the following results are as follows:

1. What process exists for establishing written standard operating procedures and guidelines?

The development and application of a standard operating procedure and guideline can be accomplished in the following ways; (a) adopt national standards as written, (b) adopt national standards and modify to local needs, (c) a department can internally develop its own procedures/guidelines, and (d) adopt procedures/guidelines being used in other departments.

One of the questions asked in the feedback form “How would you characterize your department’s SOPs/SOGs program as a model for other departments to adopt?” (On a scale of 1 to 10, with 10 being the best). No departments evaluated themselves at a score of 10. However 23% rated their programs between 8 and 9 on the scale. These programs on the higher end of the scale received greater review upon the development of Wellesley’s SOP/SOG program. The process of establishing SOPs and

SOGs begins with the authority of the Chief with input from personnel to create support and ownership from the organization.

2. What is the process for establishing written standard operating procedures in comparable departments in Massachusetts?

A question on the feedback form asked, "Does your department use written SOPs and/or SOGs?" The response from all the communities asked indicated that 92% used one or both of these control methods.

Another question on the feedback form asked, "How does your organization develop SOPs and/or SOGs?" The results of this question as to what processes exist for establishing written operating procedures and guidelines are that of the 13 departments, 100% use a mixture of all the various methods to establish SOPs and/or SOGs. These SOPs and SOGs are developed several ways which include 54% of the respondents have adopted some national standards as written, 92% have adopted some national standards modified to suit local needs, 100% of the respondents have developed their own internal SOPs/SOGs and lastly 69% of the respondents have adopted procedures used in other departments. It is noted that the 13 departments each uses standards that result from any of the above mentioned sources.

When asked, "Which term does your department use?" 54% of the respondents use SOGs, 31% of the respondents use SOP and 15% opt not to use either term. It is the contents of the standard not the overall title of procedure/guideline that is the most significant in the development and

application process. All of the various methods used to arrive at the development of a standard have a value when identifying your problem solving or coordinating objectives. All methods for the development of a standard should be considered in order to select the appropriate solution to provide for the intended operational outcome.

3. What are the benefits of establishing written standard operating procedures?

The establishment of written standards is a tool for the coordination of efforts resulting in the safest or most efficient use of available resources. The standards must be supported by enforcement from the governing/administrative departmental or agency leader, with a consequence for failure to comply. The degree of discretion afforded a department member is determined in the selection of words used to establish a particular procedure or guideline. A question asked on the feedback form "Does your department follow a pattern of progressive disciplinary action for failure to follow departmental operating procedures?" 100% of the respondents indicated that their respective departments follow this progressive structure of disciplinary action. It is the enforcement of the written directives of procedures that establish them as coordinating organizational tools. The organizational responses become consistent, efficient and safer.

The respondents were asked "How would you rate the value of SOPs/SOGs in terms of their operational benefits to your department?"

On a scale of 1 to 10, with 10 being the best the distribution of responses are as follows: 71% stated that the operational benefits were between 7 and 10, while 29% stated that the operational benefits fell between 5 and 1. The value of procedures and guidelines in departmental operations is directly related to the quality by which they are written, the training and understanding by the personnel and lastly the enforcement by administration. The SOP/SOG should be a tool that enhances and speeds up the decision making/response process.

Another question on the feedback form asked, "Do you believe SOGs' permissive wordings (should and may) provide greater operating flexibility that the SOPs' mandatory wordings (shall and will)?" The responses indicated 85% believe that SOGs provide greater operating flexibility while 15% believe that there is no additional flexibility between SOPs and SOGs. The SOP and SOG are two separate written instructions used to achieve an objective. The SOG allowing for discretion while the SOP does not allow for discretion. The direction provided by the SOP and SOG will increase the moral in the department, as individuals are aware of their responsibilities within the organization.

4. What are the legal implications of establishing written standard operating procedures?

A question asked on the feedback form, "Do you believe there is a difference in departmental liability using SOPs and SOGs?" 62%

responded believe that there is no difference in liability while 38% believe that there is a difference in departmental liability.

The responses from the three attorneys' solicited opinions on the questions asked in Appendix E, are supportive of the following answer to, "What are the legal implications of establishing written standard operating procedures/ guidelines?"

The legal implications of establishing written SOPs and SOGs are based on Massachusetts General Laws Chapter 258 Sections 1-13. As stated by Attorney Brown in (Appendix H) and Attorney Robinson in (Appendix G), "The Tort Claim Act presently limits a municipality's liability up to the amount of \$100,000". In addition Brown states, "Employees of municipalities are granted immunity from suit for injury or loss resulting from his or her negligent or wrongful act or mission while acting within the scope of his or her employment, so long as he or she provides reasonable cooperation to the defense of the municipality". There are some exceptions to the immunity protection that are outlined in (Appendix H) in more detail.

The legal opinions suggest that the liability issue involving an SOP or SOG given the exceptions contained in Section 10 of the law, there would be little distinction in a municipality department's liability with respect to the adoption of SOP versus SOG.

Written SOGs establish a general standard of care/action that may or may not lead to a limited liability as set by state law for the department.

The general legal consensus suggests the department is not affected by the terms SOP/SOG as a legal issue, but more of an operational matter. The operational benefits are the creation of expected responses to particular situations. Having too many procedures that allow for discretion may undermine or defeat the point of having standard predictable responses.

Written Standard Operating Procedures/ Guidelines need to be reviewed and updated on a regular basis. The SOP/SOG documents need to be considered “works in progress” that are subject to change as conditions in the fire organization warrant. Such conditional changes would be technological advancements, staffing increases or reductions, and lessons learned from the outcome of litigation surrounding particular issues.

Lastly, the legal implication of the establishing of SOPs/SOGs may impact the collective bargaining agreement with any unions in the organization. As noted by attorney’s, the unions have bargaining rights under Massachusetts State Law Chapter 150E, Section 6 and the municipality has the obligation to negotiate and inform the union of any departmental changes that impact the contract.

The method of organization of SOPs/SOGs that best suits the Wellesley Fire Department was selected from, *Standard Operating Procedures and Guidelines*, written by John Lee Cook, JR. His process for numbering SOPs/SOGs is to assign a unique three-digit number to each general section or subsection. Cook’s example was as follows:

100 Rules and Regulations

200 General Administration

300 Maintenance

Each category can be divided into subheadings, for example, Section 300, Maintenance; can be divided into the following subcategories:

301 Fire Hose Maintenance

302 Apparatus Maintenance

The subcategory of section 301 can be further subdivided by a decimal point or two additional digits to create a very specific SOP for example, SOP 301.02 Fire Hose Testing. This process allows for 99 SOPs of each category and subcategory to be developed using this method.

It is also the decision of the author to select the format used by the Fire Department in the community of Framingham, Ma. as that departments SOPs written structure closely follows the NFPA model of an SOP. The Framingham Fire Department s SOP lists the scope, purpose, procedure and the assignment of specific roles for the purposes of accountability, an example is available in (Appendix J).

The finished product of this research project is the writing of an initial SOP and a system to organize them in the most efficient manner. This initial SOP will reflect the structure of an SOP and the organizational system used to locate and maintain the standards. The WFD's first SOP will be used to explain a structure of an SOP and a system of organizing SOPs. This SOP will be located in, Section 100 of the Rules and Regulations of the Wellesley Fire Department, Subsection 101.00 Written Departmental Documents Structure and Purpose, under subsection 101.00 is the SOP 101.01 Standard

Operating Procedures and the Standard Operating Procedures Manual, Structure and Content. This adopted structure of an SOP and an SOP manual is demonstrated in the format of the first WFD SOP located in the (Appendix I). The last element necessary to complete the intended goal of this project is the General Order signed by the Chief of the Department authorizing the use of SOP 101.01 as the guide to the development of an SOP program/manual for WFD. This General Order is located for review in (Appendix K).

Discussion

The results of this research indicate that there are several methods for establishing written SOPs and SOGs. The first method is the adoption of a national standard as written, such as, NFPA 1500 states that, "a fire department shall prepare and maintain written policies, standard operating procedures and guidelines, and provides for a program implementation period", (NFPA, 2002b, section 4.1.2).

Secondly, a department can adopt a national standard and modify it to local need or copy SOPs and SOGs being used in other departments. This method is clearly pointed out by the author Knapp when he states "... SOPs are a great way to protect members by learning from other departments tragedies". He stresses adopting SOPs that work in other departments, while not having to develop your own standards from the ground up (Knapp, 1999,p.9).

Another method of establishing written standards is the internal development of a standard by a department. The process of developing an internal standard needs to follow a logical problem solving pattern, "define the problem and obtain the data, identify useful alternative courses of action, select the alternative that is best for a given

situation, and consider the probabilities of unforeseeable events, as this is an ongoing form of risk management” (Carter and Rausch, 1999,p.85). In addition the internal process must have, as Parker states, “... support from departmental leadership, support from rank and file, training to change attitudes, effective use of the incident command system, and appointment and support of safety officers” (Parker, 2002,p.14).

It is the findings of the researcher that all the various methods of establishing SOPs and SOGs can benefit an SOP/SOG program by providing standards that will reflect the specific values of your department, while addressing your operational needs.

The second question analyses the process for establishing written SOPs and SOGs in comparable departments in Massachusetts. The feedback form sent to the comparable communities provided the data to assess other communities SOP and SOG programs (Appendix B). It was interesting to view the results of the feedback form, (Appendix D), as 100% of the departments use a mixture of all the various methods to develop an SOP/SOG program for their community. 54% of the departments indicated that they had adopted some national standards as written but only as the standard suited their community both operationally and from a resource perspective. The greatest difficulty for the adoption of a standard comes down to the financial resources of the department to implement such standards. With these limitations in mind, 100% of the respondents have developed their own SOPs via the modification of a national standard or as 69% of the respondents indicated have adopted procedures used in other departments in which there resources could replicate.

The results of the feedback form demonstrate that most comparable communities, in the development of their SOP/SOG programs, prefer an ‘a la carte’

selection process. It is this varied method of SOP/SOG development in a department that allows for the creation of a very sound yet well suited set of SOPs/SOGs. These varying methods of SOP/SOG development and selection are supported by literature review citations in the discussion section regarding the first research question.

The results regarding the research of third question demonstrate that the benefits of establishing SOPs/SOGs are significant. It is the pursuit of safety, efficiency and organizational control that drives the development of written SOPs and SOGs. The WFD has adopted an SOP program that will be enforced, but will clearly state in very specific procedures the department's permission to deviate from the procedure under extremely unique circumstances. This system provides for the strict application of Standard operating procedures while providing flexibility only when specifically stated in the procedure. In reviewing all the information gathered, there are significant benefits from establishing and enforcing written SOPs.

The benefits of SOPs are presented in the *Emergency Operations Center Course Manual*, when it states " SOPs need to be available as a reference manual and can serve as a training tool" (EMI, 1995,p.33). The SOP/SOG must be clear, concise and attainable. SOPs/SOGs need to be frequently tested by personnel through the process of drilling/practicing to achieve an appropriate response capability. The research supports that time dedicated to developing and practicing an SOP/SOG will improve the consistency of an organizations performance and speeds up response times.

Another benefit of SOPs/SOGs is the stability the written documents bring to the continuity of an organization. The issue of continuity is discussed as a specific benefit to personnel and the organization itself. "As a written document, continuity is

maintained for the duration and leadership succession of the organization”, (Heimlich and Dresbach, 2002, p.2). The organizations activities are uniform when written and are less vulnerable to be impacted by an individual’s interpretation of how to appropriately respond to a situation. SOPs/SOGs provide the employee with a clear understanding of the organization’s expectations.

The benefits of SOPs/SOGs are displayed in the *NFPA Fire Protection Handbook 18th Edition*, “every fire department should have a set of rules and regulations that outline performance expectations for its members, standard operating procedures for the department and disciplinary actions that may be taken for failure to follow regulations”, (NFPA, Section 10/Chapter 1, p. 10). The employee’s moral is increased from understanding the expectations of the employer and other employees.

The positive effects of SOP/SOGs are significant as the results sited in the feedback form (Appendix D), shows 71% of the departments stated that the operational benefits were between 7 and 10, on a scale of 1 to 10, with 10 being the best. The results supported the concept of SOP/SOGs being a tool that enhances and speeds up the decision making response process. This ability to make decisions faster based upon department rules take the pressure of decision making off the individual by the organization providing safe, tested methods to achieve results.

In conclusion, the benefits of establishing written SOPs/SOGs are clearly significant to the effectiveness of the individual employee and entire organization in achieving the department’s mission.

The results of the research regarding the legal implications of establishing written standard operating procedures was very straight forward as the laws of the

State of Massachusetts limit the liability of a municipality. There are several parts to address regarding the finding in the research. The first will address the responses from the feedback form from the other department's, the second part deals with the information in the literature review and Professor Brannigan's response, and lastly the responses from the two Massachusetts attorneys.

The responses from the other departments were as follows: when asked the question "Do you believe there is a difference in department liability between using SOPs and SOGs?" 62% responded that there is no difference in liability and that response is completely accurate with the findings of this research. That there is no distinction in departmental liability but rather these terms pertain to operational instructions. There are some departments that indicated there is a liability difference between the two terms and have chosen one over the other to provide what they believe to be some liability protection. Further in this discussion I will demonstrate the information provided by the attorneys from Massachusetts that will clearly explain why there is no distinction in liability between the two terms.

The questions posed to professor Brannigan, put him in a position in which he could only provide generalized answers. In the concluding results of this research, it was clear that the laws of the State of Massachusetts would dictate specifically as to the department's liability using SOPs and SOGs. Upon reviewing the information provided by the two Massachusetts attorneys, it was clear that information provided by the various authors in the literature review was, at best, only general information. So in regards to answering question 4 of the research project the best information to address the question would come from the two Massachusetts attorneys.

Attorney Brown states, "... given the additional exemptions contained in Section 10 as the same may pertain to a fire department's mission, it would seem that there would be little opportunity for difference in a municipal department's potential liability with respect to the adoption of an SOP versus an SOG" (Appendix H). The laws, as written, allow for a judgment against a municipality an unlikely conclusion. However, there are exceptions in Section 10 but there is still a maximum liability figure of \$100,000. Town Counsel Robinson States, "Accordingly, whether a guideline is mandatory on an employee or discretionary, from the perspective of departmental legal liability for something gone wrong, the difference is without distinction" (Appendix G). The written standards establish evidence in regards to fellow employees and the department as a whole as to what should have been done and by whom. The department is responsible to enforce the standards to establish a safe, coordinated and predictable response to given situations as they arise. It was interesting to understand the relationship that develops as a result of standardized processes, an expectation of performance.

Another issue related to the legal implications of establishing SOPs and SOGs is the impact may involve negotiating with the local collective bargaining unit. It was surprising to find that the establishment of an SOP may in fact be directed through the state of Massachusetts Public Employees Bargaining Laws, Chapter 150E. The Chief, as the representative of the municipality, has an obligation to inform the union of any change or introduction of an SOP that has any direct relationship with the collective bargaining contract.

It was interesting to read the response of the union attorney as he addressed the question, 'what are the benefits of establishing written SOPs and SOGs?'. Attorney Brown states three points. First, the most obvious benefit is insuring a more uniform response to routine situations. Secondly, there may be an enhanced ability to determine and assign responsibility for action or conduct. Lastly, it was stated that morale would be enhanced with the adoption of standardized responses. It was interesting to note that even from within the union there is a strong desire to have specific assignments to be able to identify each person's intended function. The SOPs provide a safer, more efficient, and coordinated response to situations, but clearly identifies the individual's responsibilities. It is these individual's responsibilities or failure to follow the SOP that would result in a disciplinary action against a union member. It is the researcher's opinion that the overall safety considerations are the driving factor behind the willingness of a union to support a written SOP program that lends itself to disciplinary action.

Recommendations

It is the recommendation of the researcher that the WFD continue in the future to implement and review operating procedures as ongoing process of individual and organizational development. All methods of SOP development should be given consideration and input from personnel to create a strong sense of departmental ownership.

The advice to future researchers is to explore the procedures of other organizations and use their talents to find solutions to your problems. There is no need

to reinvent the wheel, so save your limited resources to modify existing solutions to meet your needs.

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Appendix A

Cover Letter to Explain the Research Project/Feedback Form

**TOWN OF WELLESLEY FIRE DEPARTMENT**

457 WORCESTER ST.
WELLESLEY, MA 02481
Telephone 781-235-1300

RICHARD A. DeLORIE
DEPUTY FIRE CHIEF
FAX 781-237-3161

Name
Address
City
State, Zip

February 5, 2003

Dear Chief,

I am the Deputy Fire Chief in the Town of Wellesley Fire Department. I am also a student in the National Fire Academy's Executive Fire Officer Program (EFOP). To fulfill a requirement for the completion of the program as well as supply the Town of Wellesley Fire Department with necessary information, I am conducting research relative to methods of standardizing operations using standard operating procedures, standard operating guidelines, or other methods to improve safety, and efficiency of operations. As part of this effort, I am respectfully requesting your department's assistance by asking you to complete the attached survey form. Enclosed is a self-addressed stamped envelope and thank you for your time.

Sincerely,

Richard A. DeLorie

7) Does your department follow a pattern of disciplinary action for failure to follow departmental operating procedures? Check all that apply:

- Verbal Corrective Action
- Written reprimand/corrective action
- Suspension
- Termination
- Other, please explain:

Explain/comment: _____

8) How would you rate the value of SOPs/SOGs in the terms of operational benefits within your department?

On a scale of 1-10, with 10 being the best, please rate the benefits to your department.

- | | | | | | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

9) How would you characterize your department's SOPs/SOGs program as a model for other departments to adopt?

On a scale of 1-10, with 10 being the best, please rate your department.

- | | | | | | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Other Comments/Explanations:

Department name _____
 (Optional)

Appendix C

Town Of Wellesley -List of Comparable Communities

Arlington

Belmont

Brookline

Concord

Dedham

Framingham

Lexington

Milton

Natick

Needham

Newton

Wayland

Winchester

Appendix D

Raw Data Results of Feedback Form

	<u>Respondents/Percentage</u>	
Departments reporting	(13)	100%
1) Does your department use written standard operating procedures (SOPs) and/or standard operating guidelines(SOGs)		
YES	(12)	92%
No	(1)	8%
2) If you answered No, to question 1, please explain your method Of maintaining consistent organizational operations.		
Explanation: Information is written in memo form	(1)	100%
3) If you do use written SOPs/SOGs how do you and your organization develop these?		
Adopt national standards as written	(7)	54%
Modified National standard to local	(12)	92%
Develop your own internal	(13)	100%
Adopt procedures used in other departments	(9)	69%
Other	(0)	
4) Which term does your department use?		
SOP	(4)	31%
SOG	(7)	54%
5) Do you believe there is a difference in departmental liability between Using SOGs and SOPs?		
YES	(5)	38%
NO	(8)	62%
6) Do you believe SOGs permissive wordings (should and may) provide Greater operating flexibility than the SOPs mandatory wordings (shall And will)?		
YES	(11)	85%
NO	(2)	15%
7) Does your department follow a pattern of disciplinary action for failure to follow departmental operating procedures?		
Check all that apply:		
<input type="checkbox"/> Verbal Corrective Action	(13)	100%
<input type="checkbox"/> Written reprimand/corrective action	(13)	100%
<input type="checkbox"/> Suspension	(13)	100%
<input type="checkbox"/> Termination	(9)	69%
<input type="checkbox"/> Other, please explain:	(0)	

Respondents/Percentage

- 8) How would you rate the value of SOPs/SOGs in terms of operational benefits to your department.

On a scale of 1 to 10, 10 being best.

10	(1)	7%
9	(4)	33%
8	(2)	16%
7	(2)	16%
6	(0)	
5	(1)	7%
4	(1)	7%
3	(1)	7%
2	(0)	
1	(1)	7%

9) How would you characterize your department's SOPs/SOGs?
Programs as a model for other departments to adopt.

On a scale of 1 to 10, 10 being best.

10	(0)
9	(2)
8	(1)
7	(2)
6	(2)
5	(3)
4	(1)
3	(2)
2	(0)
1	(0)

Appendix E

Questionnaire for Attorney's

**TOWN OF WELLESLEY FIRE DEPARTMENT**

RICHARD A. DeLORIE
DEPUTY CHIEF
Telephone 781-2357-1300

457 WORCESTER ST.
WELLESLEY, MA 02481
Fax 781-237-3161

Name

Address

Town, State, Zip code

Phone number

February 16, 2003

Dear Sir,

I am writing a research project for the National Fire Academy's Executive Fire Officer Program. The research will assist in resolving operational problems in many departments. I am respectfully requesting your comments on the following questions. Please respond addressing these questions from a liability perspective that includes employer, employee and those people receiving services from the fire department. I have included definitions of Standard Operating Procedures and Standard Operating Guidelines as defined by nationally accepted standard establishing organization in the fire service:

- A) Standard Operating Procedures - A written statement of procedures designed to standardize general activities, stating what shall and will be done at a given activity.
- B) Standard Operating Guidelines - A written statement of procedures that allows for greater flexibility advising what should be done but allowing for adaptability to a given activity.

1. Do you believe there is a difference in departmental liability between using SOGs and SOPs? Do you believe SOGs permissive wording (should and may) provide greater operating flexibility than the SOPs mandatory wording (shall and will)?
2. What are the benefits of establishing written standard operating procedures and/or standard operating guidelines?
3. What are the legal implications of establishing written standard operating procedures and/or standard operating guidelines?
4. Do you believe that a progressive discipline structure ranging from verbal corrective action, written corrective action, suspension and/or termination are necessary to enforce standard operating guidelines and/or procedures?

I sincerely appreciate your attention and participation toward improving fire department operations in Wellesley and other departments.

Thank You,

Richard A. DeLorie

Appendix F

Response From Professor Vincent Brannigan

**TOWN OF WELLESLEY FIRE DEPARTMENT**

RICHARD A. DeLORIE
DEPUTY CHIEF
Telephone 781-2357-1300

457 WORCESTER ST.
WELLESLEY, MA 02481
Fax 781-237-3161

Professor Vincent M. Brannigan
University of Maryland
(301) 405-6667
Firelaw@wam.umd.edu

February 19, 2003

Dear Sir,

I am writing a research project for the National Fire Academy's Executive Fire Officer Program. The research will assist in resolving operational problems in many departments. I am respectfully requesting your comments on the following questions. Please respond addressing these questions from a liability perspective that includes employer, employee and those people receiving services from the fire department. I have included definitions of Standard Operating Procedures and Standard Operating Guidelines as defined by nationally accepted standard establishing organization in the fire service:

- C) Standard Operating Procedures - A written statement of procedures designed to standardize general activities, stating what shall and will be done at a given activity.
- D) Standard Operating Guidelines - A written statement of procedures that allows for greater flexibility advising

what should be done but allowing for adaptability to a given activity.

5. Do you believe there is a difference in departmental liability between using SOGs and SOPs? Do you believe SOGs permissive wording (should and may) provide greater operating flexibility than the SOPs mandatory wording (shall and will)?

I believe any attempt to distinguish between them solely for liability will fail. What you need to do is have a real difference between them E.g. failure to follow procedures is a disciplinary event. Failure to follow guidelines is not.

6. What are the benefits of establishing written standard operating procedures and/or standard operating guidelines?

Not sure it's a legal question.

7. What are the legal implications of establishing written standard operating procedures and/or standard operating guidelines?

Can set a standard of care. May or may not result in liability

8. Do you believe that a progressive discipline structure ranging from verbal corrective action, written corrective action, suspension and/or termination are necessary to enforce standard operating guidelines and/or procedures?

If you use discipline to enforce guidelines, they become procedures.

I sincerely appreciate your attention and participation toward improving fire department operations in Wellesley and other departments.

Quick answer, we are in snow here.

Vince

Thank You,

Richard A. DeLorie

Appendix G

Response From Attorney Robinson

TOWN OF WELLESLEY



MASSACHUSETTS

ALBERT S. ROBINSON, TOWN COUNSEL

TELEPHONE (781) 235-3500
TELECOPIER (781) 235-8090

March 18, 2003

40 GROVE STREET
WELLESLEY, MA 02482-7729

Richard A. DeLorie, Deputy Chief
Wellesley Fire Department
457 Worcester Street
Wellesley, MA 02481

RE: Your Research Project

Dear Deputy Chief:

This responds to your February 19, 2003 letter in which you asked for my informal opinion on four questions. In responding, I want to make it clear preliminarily that this response is not to be taken as a formal, studied response on my part, but rather an informal reaction to the issues raised as a part of your research project for the National Fire Academy's Executive Fire Officer Program. In that context, then, here is what I think in response to your questions:

Your first question is whether I see a difference in "departmental liability" between a standard operating procedure (using your definition of this term, this would be mandatory) and a standard operating guideline (discretionary).

From the context of departmental legal liability, there probably is no difference. While Massachusetts law does provide some safe haven against municipal liability for certain discretionary acts, the type of discretion that you are contemplating is probably not sufficiently broad enough discretion to come within this liability protection. Accordingly, whether a guideline is mandatory on an employee or discretionary, from the perspective of departmental legal liability for something gone wrong, the difference is without a distinction.

I think it prudent to add to this discussion, however, the importance of drafting procedures and/or guidelines that are best designed to accomplish the Fire Department's mission of saving lives and protecting property. My best advise is that if procedures and guidelines are written from

that perspective, and then the importance of limiting the Town's legal liability will follow naturally. In other words, fight fires well to the best of modern techniques, and the best shot of avoiding municipal tort liability for something gone wrong will be minimized.

Another part of your first question is whether having guidelines, as opposed to procedures, will provide greater operating flexibility. This is not a legal question, but one that the commanding officer would be better primed to answer I believe. Certainly on the surface, a discretionary guideline provides greater flexibility than a mandated procedure, but in actual practice, in the field, when confronted with an emergency, whether the employee is better able to perform his or her duties in the operational context given mandated or discretionary direction is better answered by the person in charge of the operation. Privates in the army are probably better charged with mandated procedures than with an opportunity to exercise some discretion. Master Sergeants, however, given their greater experience, would be more able to handle discretionary decisions. Some jobs are for privates; some jobs are for master sergeants. The commanding officer is the one who decides, not the lawyer.

Your second question asks me to identify benefits in establishing written procedures and guidelines.

The basic benefit would be that everyone knows what the procedures and guidelines are. No room for miscommunication or misunderstanding. They can also be reviewed from time-to-time, and will always be the same (unless, of course, changed in a subsequent writing).

Another benefit is that if one claims that a mistake was made by not following a procedure or guideline, at least there will be the benchmark of what the specific procedure or guideline was. A downside, not a benefit, in having these things written down is that if there is a failure to perform, the written procedure or guideline will be available to establish evidence as to what the employee should have done.

Your third question asks me to identify the legal implications of establishing written procedures and guidelines. I cover this in answering your second question.

Your last question is whether a progressive discipline structure would be necessary to enforce standard operating guidelines and procedures.

The way you ask the question provides the answer, since you presume that the guidelines and procedures should be enforced. I agree that a progressive discipline structure is the traditional way of providing an enforcement mechanism.

Please let me know if further discussion on any of this could be useful.

Very truly yours,

Albert S. Robinson

ASR:mp

File: WF-GEN

V:\asr\town\firedept\delorie32103ltr

Appendix H

Response From Attorney Brown

TO: RICK DELORIE

FROM: DENNIS BROWN

DATE: MARCH 10, 2003

RE: SOP's/SOG's

INTRODUCTION

This memorandum is designed to address three separately categorized "issues" with respect to standard operating procedures (defined as "a written statement of procedures designed to standardize general activities, stating what shall and will be done at a given activity") and standard operating guidelines (defined as "a written statement of procedures that allows for greater flexibility advising what should be done but allowing for adaptability to a given activity").

The three specific categories of issues to be addressed are as follows:

1. Do you believe there is a difference in departmental liability between using SOG's and SOP's? Do you believe SOG's permissive wording (should and may) provide greater operating flexibility than the SOP's mandatory wording (shall and will)?
2. What are the benefits of establishing written standard operating procedures and/or standard operating guidelines?
3. What are the legal implications of establishing written standard operating procedures and/or standard operating guidelines?

ISSUE # 1

A. Do you believe there is a difference in departmental liability between using SOG's and SOP's?

The first point of analysis concerning "departmental liability" (assumed to refer to a municipal fire department) would be examination of the Massachusetts Municipal Tort Claim Act, Massachusetts General Laws Chapter 258, Sections 1 through 13. In general, the Tort Claim Act presently limits a municipality's liability for negligent conduct up to the amount of \$100,000.00.

Employees of municipalities are granted immunity from suit for injury or loss resulting from his or her negligent or wrongful act or omission while acting within the scope of his office or employment, so long as he or she provides reasonable cooperation to the public employer (municipality) in the defense of any action brought under the Tort Claim Act. (See M.G.L. c.258, §2).

Section 10 of the Tort Claim Act provides exclusions from liability to municipalities in certain circumstances or situations. Several of these “exceptions” may be particularly important with respect to determination of liability concerning a municipal fire department. Among these are the following subparagraphs:

(a) any claim based upon an act or omission of a public employee when such employee is exercising due care in the execution of any statute or any regulation of a public employer, or any municipal ordinance or by-law, whether or not such statute, regulation, ordinance or by-law is valid;

(b) any claim based upon the exercise or performance or the failure to exercise or perform a discretionary function or duty on the part of a public employer or public employee, acting within the scope of his office or employment, whether or not the discretion involved is abused;

(f) any claim based upon the failure to inspect, or an inadequate or negligent inspection, of any property, real or personal, to determine whether the property complies with or violates any law, regulation, ordinance or code, or contains a hazard to health or safety, except as otherwise provided in clause (1) of subparagraph (j).

(g) any claim based upon the failure to establish a fire department or a particular fire protection service, or if fire protection service is provided, for failure to prevent, suppress or contain a fire, or for any acts or omissions in the suppression or containment of a fire, but not including claims based upon the negligent operation of motor vehicles or as otherwise provided in clause (1) of subparagraph (j).

(j) any claim based on an act or failure to act to prevent or diminish the harmful consequences of a condition or situation, including the violent or tortious conduct of a third person, which is not originally caused by the public employer or any other person acting on behalf of the public employer. This exclusion shall not apply to:

(1) any claim based upon explicit and specific assurances of safety or assistance, beyond general representations that investigation or assistance will be or has been undertaken, made to the direct victim or a member of his family or household by a public employee, provided that the injury resulted

in part from reliance on those assurances. A permit, certificate or report of findings of an investigation or inspection shall not constitute such assurances of safety or assistance; and

(2) any claim based upon the intervention of a public employee which causes injury to the victim or places the victim in a worse position than he was in before the intervention; and

(3) any claim based on negligent maintenance of public property;

(4) any claim by or on behalf of a patient for negligent medical or other therapeutic treatment

received by the patient from a
public employee.

One of the most litigated provisions of the Tort Claim Act is the so-called “discretionary function” exception contained in Section 10(b). Discretionary acts under the statute are those which are characterized by a high degree of discretion and judgment involved in weighing alternatives and making choices with respect to public policy and planning; however, those acts which involve the carrying out of previously established policies or plans are not considered discretionary acts. *See, e.g., Whitney v. Worcester, 373 Mass. 208 (1977).*

In determining whether an act of a public employee involved discretionary conduct the following inquiries have been considered relevant:

1. Was the injury-producing conduct an internal part of governmental policy making or planning?
2. Might the imposition of tort liability jeopardize the quality and efficiency of governmental process?
3. Could a judge or jury review the conduct in question without usurping the power and responsibility of the legislative or executive branches?

4. Is there an alternate remedy available to the injured individual other than an action for damages?

The first step in analysis of the question of whether a claim is foreclosed by the discretionary function exemption or exception is to determine whether the governmental actor had any discretion at all as to what course of conduct to follow. The first step involves a determination of whether the actor had any discretion to do or not to do what the Plaintiff may claim caused him or her harm. If the governmental actor had no discretion because the course of action was described by a statute, regulation or established agency practice, a discretionary function exemption to governmental liability would have no role in deciding a question pertaining to municipal liability. See Harry Stoller & Co., Inc. v. City of Lowell, 412 Mass. 139 (1992), (which held that city firefighters' exercise of their discretion not to use buildings' sprinkler systems to fight fire did not involve policy and planning considerations and, thus, discretionary function exception of the Tort Claims Act did not shield the city from liability).

The second step in determining whether or not the discretionary exception applies is to determine whether the discretion at issue is the kind, which the statute provides immunity from liability. Almost all conduct involves some exercise of discretion but the statute is intended to address discretion which is far narrower. The statute provides immunity only for discretionary conduct that involves policy making or planning. If the conduct at issue was an integral part of governmental policy making or planning, or if the imposition of liability might jeopardize the quality of the

governmental process, or if the case could not be decided without usurping the power and responsibility of either the legislative or executive branch of government, the court's favor finding the application of the discretionary exception. See Whitney v. Worcester and Harry Stoller, *supra*, and Horta v. Sullivan, 418 Mass. 615 (1994).

Lastly, it is important to keep in mind that the immunities provided by Section 10 of the Tort Claims Act operate in the alternative. That is, even if one of the enumerated immunities may not apply, if others apply then the claim would be barred. Thus, for example, with respect to the Harry Stoller case involving Lowell's firefighters (which held that the "discretionary" exception did not apply and which was decided in 1992 before a recent amendment to Section 10) there might still be no municipal liability for the same conduct because of Section 10(g) which provides that any claim based upon the failure to establish a fire department or a failure to prevent, suppress or contain a fire, or for any acts or omissions in the suppression or containment of a fire are excepted from liability. Compare also Section 10(j)(4) which excepts any claim for negligent medical or other therapeutic treatment.

In the final analysis, however, while it might be argued that SOG's as opposed to SOP's might provide better opportunity for argument that particular conduct at issue may involve an exercise of discretion (and thus provide greater liability protection), given the additional exceptions contained in Section 10 as the same may pertain to a fire department's mission, it would seem that there would be little opportunity for difference in a municipal department's potential liability with respect to adoption of an SOP versus an SOG.

B. Do you believe SOG's permissive wording (should and may) provide greater operating flexibility than the SOP's mandatory wording (shall and will)?

It would appear that this question portends its own answer. Certainly, the choice of wording here indicates greater "flexibility" with adoption of SOG's versus SOP's; however, permitting a department wide opportunity for exercising discretion in the myriad of situations which arise may well defeat the essential purpose of adopting standardized responses to anticipated situations.

ISSUE # 2

What are the benefits of establishing written standard operating procedures and/or standard operating guidelines?

The most obvious benefit to be derived from adoption of either SOP's or SOG's is ensuring a more uniform response to routine situations. In addition to the "predictability" involved, there may also be an enhanced ability to determine and assign "responsibility" for action or conduct. Certainly, morale will be enhanced by adoption of "standardized" responses.

ISSUE # 3

What are the legal implications of establishing written standard operating procedures and/or standard operating guidelines?

See discussion concerning Issue # 1(A) above.

Additionally, issues related to duties and responsibilities under the Massachusetts Public Employee Bargaining Law are implicated. Section 6 of the Public Employee Bargaining Law, Massachusetts General Laws Chapter 150E, requires that a

public employer and a union must meet at reasonable times to negotiate in good faith with respect to wages, hours, standards or productivity and performance, and any other terms and conditions of employment. As any SOP's or SOG's which may be adopted may bear directly upon such matters, there is an obligation to bargain in advance of a promulgation of any such SOP's or SOG's. This bargaining obligation requires meetings reasonably in advance of the promulgation of such standardized responses in order that a union may have a meaningful opportunity to bargain concerning such matters. See generally Town of Danvers, 3 MLC 1559 (1977).

Reference Materials:

- M.G.L. c.258, §§1-13
- Cited cases
- 18B Mass. Practice Series, Municipal Law & Practice §1955

Appendix I

Framingham Fire Department S.O.G. #13

WATER RESCUE & RECOVERY

- 13.1 SCOPE:** This Standard Operating Guideline for water rescue/recovery procedures sets forth actions that should define safe and effective operations by fire personnel. Deviations from this guideline by Framingham Fire personnel because of the dynamic and complex situations of a rescue/recovery operation are sometimes unavoidable. This SOG has been compiled so that we may more effectively serve the public by promoting maximum water/diving safety within the Framingham Fire Department. Fire Department personnel should be thoroughly familiar with the operating procedures and policies contained within this SOG. While only a trained and certified Water/Dive Rescue Specialist will be allowed in the water, any member of the Framingham Fire Department may be called upon to support the water rescue/recovery operation.
- 13.1.1 The Framingham Fire Department Water Rescue/Recovery Team may be called upon in any weather, at any time and often in situations of zero visibility to initiate a rescue/recovery operation. Individuals engaging in aquatic rescue, particularly under adverse conditions must realize that the activity they are undertaking is inherently dangerous.
- 13.1.2 There are three basic rules of safety for aquatic rescue/recovery operations:
1. The Water Rescue Team, with the approval of the Incident Commander, shall decide whether or not to proceed with the dive operation or continue with the surface rescue based on a risk/benefit consideration.
 2. Each individual rescuer has the right to refuse to dive for any reason without penalty.
 3. All equipment is to be considered expendable, where personnel safety is concerned.
- 13.1.3 No SOG can exhaustively account for all situations regarding aquatic rescue/recovery. Nor can any SOG replace (nor is this SOG intended to replace) comprehensive instruction under the supervision of competent instructors. This is meant to serve as a guide only and specific situations or incidents should be guided by the establishing of operating procedures or guidelines established by competent instructors and training agencies.
- 13.2 OBJECTIVES**
- 13.2.1 To establish this standard; that all aquatic rescue/recovery operations carried out by the Framingham Fire Department be conducted in such a manner as to minimize accidental injury or occupational illness to divers and support crews.

- 13.2.2 To set forth rules, regulations and standards for training, qualification, endorsement, equipment and operations that conform to the requirements of the Occupational Health and Safety Administration and or Dive Rescue International.
- 13.2.3 To establish guidelines for the safe and efficient operation of the Framingham Fire Department Water Rescue/Recovery Team.
- 13.2.4 To establish guidelines for fire and rescue units arriving prior to the Framingham Fire Department Water Rescue/Recovery Team or operating at the scene of any water related incidents.
- 13.2.5 To maintain independence from other agencies, organizations or groups. The Framingham Fire Department shall not repudiate its authority or responsibility with respect to aquatic rescue/recovery operations, but may cooperate with other agencies or groups when necessary to safely and effectively conduct or conclude the operation.

13.3 DIVE TEAM MEMBERSHIP REQUIREMENTS

- 1. Diver member must be certified from any nationally accredited agency.
- 2. Diver member must be Dive/Rescue Specialist certified within one year of being on team.
- 3. Diver member must be both a certified diver and certified dive/rescue specialist to dive in either an emergency rescue operation or an emergency recovery operation.

13.3 DISPATCH

- 13.4.1 The following guidelines shall be adhered to by the Dispatcher in the event of a water rescue/recovery:
 - 1. The Dispatcher shall ascertain the location of the body of water.
 - 2. Get the location and name of person calling.
 - 3. Get call back numbers and address of caller.
 - 4. Nature or type of incident such as person in the water, overturned boat, or vehicle in the water.
 - 5. Number of victims.
 - 6. Remind caller to remain on scene or at their location until fire personnel arrive.
 - 7. Caller using cell phone should stop where they are to wait for further instructions.

13.5 RESCUE OPERATION ACTIVATION

- 13.5.1 Activation for this type of operation will usually be initiated by the Fire Alarm Dispatcher upon receipt of a call and questioning of the caller.
- 13.5.2 Initial response will consist of the nearest engine company with their boat, the rescue company with their boat, the dive team vehicle, one paramedic level ambulance at a minimum and the three (3) closest on duty divers.
- 13.5.3 First arriving diver will assume the position of the dive team leader and decide the need for additional divers based on information available.
- 13.5.4 The dive team leader will make the request for additional divers through the Incident Commander.
- 13.5.5 Additional divers will be dispatched from on duty dive personnel first, if there are not enough divers available, off duty divers will be called or paged.
- 13.5.6 Divers responding from off duty shall notify the dispatcher that they will be coming in and what their estimated time of arrival will be.
- 13.5.7 The Dispatcher will inform divers where to report with their gear.

13.6 RECOVERY OPERATION

- 13.6.1 Recovery operations will be decided by the dive team leader with the approval of the Incident Commander. All decisions will be based on the available information at the scene.

13.7 NON-VISIBLE VICTIM

- 13.7.1 The first officer on the scene shall assume command until he/she passes command or is relieved by a higher authority. The first company officer's primary function is to interview the witness using whatever resources are needed. The first officer on scene must relay the information that a non-visible victim is likely.
- 13.7.2 The rescue company shall assist the first company, prepare to launch the motor boat and help build the rescue system.
- 13.7.3 Decisions shall be made by the dive team leader as to mode of operation, rescue or recovery, by weighing all facts and using the risk/benefit approach. The risk must be

worth the benefit. Greater probability of medical recovery exists when the victim is young; the water cold and submersion time is less than 60 minutes.

13.7.4 The dive team leader shall determine when the incident is no longer a rescue. However, because of the possibility of cold water near drowning, that shall not be prior to 90 minutes from the incident notification.

13.7.5 Off duty divers shall be called in as needed, by emergency communication from the current list established and maintained by the Dive Team Coordinator.

13.7.6 Recuperation for divers is essential. The dive team leader shall ensure each working diver has enough time to recuperate.

13.8 PETS IN THE WATER

13.8.1 No fire department personnel shall place themselves at risk to rescue an animal. Pets, especially dogs, are a serious problem on the ice and in the water.

13.8.2 However, if an animal is struggling, it is possible that a civilian may try to rescue the animal; this will place the civilian in danger.

13.8.3 The Incident Commander shall decide whether an animal rescue is called for.

13.9 WITNESS INTERVIEW

13.9.1 The witness interview will be started as soon as possible using the standardized questioner form.

13.9.2 All witnesses will be interviewed separately, not in groups. Witnesses will be brought to the point where they were standing when they say the incident occurred.

13.9.3 All witnesses will be asked to identify themselves establish a victim; establish a LSP (last seen point) using a reference object such as a boat or firefighter in a rescue suit in the water.

13.9.4 Witnesses shall remain at the scene for further interviews.

13.9.5 All witness's statements will be recorded on the standardized questioner form and a sketch will be made.

13.10 BASIS OF OPERATION

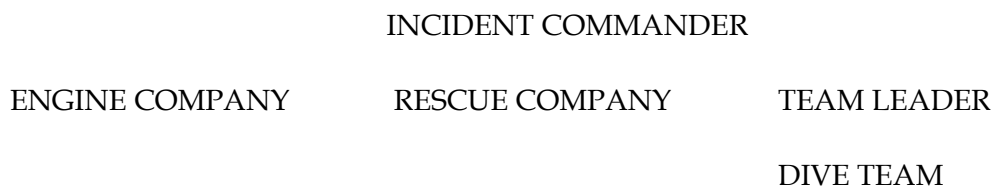
13.10.1 Once the scene size up and witness interviews are completed, the decision to work in the rescue mode or the recovery mode will be made by the dive team leader and the Incident Commander.

13.10.2 The decision to work a shore based operation or a boat based operation will also be made.

13.10.3 The rescue mode operation will be utilized if there is a chance to save human life.

13.10.4 The recovery mode operation will be used if there is no chance to save a human life or we are just trying to recover an object.

13.10.5 The Incident Command structure at a scene will be as follows:



13.10.6 A shore base operation will be utilized if the search is within two hundred (200) feet of shore.

13.10.7 A boat base operation will be utilized if the search is more than two hundred (200) feet.

13.11 SAFE OPERATION

13.11.1 Whether working in a rescue or recovery mode, the Framingham Fire Department and the dive team will work with the safety of personnel a priority.

13.11.2 The minimum people needed for a shore based dive crew shall consist of two (2) divers and one (1) line tender with PFD (Personnel Floatation Device).

13.11.3 The minimum people needed for a boat based dive crew shall consist of two (2) divers, one (1) line tender with PFD and one (1) boat operator with PFD.

13.11.4 A back up boat and boat operator with PFD shall also be on scene when a boat-based dive is in operation.

13.12 RESPONSIBILITY OF FIRST DUE COMPANY

13.12.1 Upon a response to a call involving a person or persons in or under the water, the first arriving company will assume command.

13.12.2 Interview witnesses following witness interview form.

13.12.3 Site security; maintain a secure perimeter around scene in which the rescuers and divers can function.

13.12.4 Consideration should be given to access for additional apparatus, boats, dive team vehicle, ambulances and divers responding from off duty.

13.12.5 Utilize the Police Department in this function, as they are more skilled in this area of expertise.

13.12.6 Set up staging area for dive team vehicle and other needed apparatus away from dive area but close enough to make it practical.

13.12.7 It is critical to success of the operation that a quality last seen point (LSP) be identified. This point can be marked with a boat or a person in a Gumby suit.

13.13 RESPONSIBILITY OF SECOND AND SUBSEQUENT COMPANIES

13.13.1 Companies will work under the direction of the Incident Commander.

13.13.2 Once an assigned task is completed, the company will return to the staging area and wait further instruction.

13.13.3 It is imperative that the dive area be kept clear of all unnecessary personnel and distractions. This will allow the people working to do so without interruptions.

13.14 RESPONSIBILITY OF FIRST DIVER ON SCENE

1. The first diver will assume the role of dive team leader.
2. The primary responsibility is that of liaison between the dive team and the Incident Commander.
3. This member (diver) may become the back up diver if necessary.
4. The dive team leader has the authority to stop any dive operation if he/she deems the operation to be unsafe or hazardous to the divers.

13.15 DUTIES OF PRIMARY DIVER

1. Self evaluation of fitness to dive.
2. Proper equipment fit.
3. Review line signals with line tender.
4. Complete understanding of assigned mission prior to commencing operations.
5. Proper execution of search patterns.
6. Maintain proper tension and line contact at all times.
7. Proper execution of object located procedure.
8. Proper execution of and compliance with team procedures.
9. Preservation of object location, evidence and victim dignity.

13.16 DUTIES OF LINE TENDER

1. Assist the primary and back up diver with dressing when needed.

2. Performs pre-dive equipment check of entry diver.
3. Conducts a pre-dive checklist using the standardized dive team form.
4. Review of operation mode (rescue vs. recovery).
5. Review search pattern to be used.
6. Review all line signals.
7. Track and document diver's air supply using Surface Consumption Rate from charts.
8. Control correct and efficient execution of search patterns through direct line contact and tension while maintaining visual contact with divers air bubbles at all times and when appropriate through direct verbal contact with diver.
9. Notify Incident Commander as soon as object is found.
10. Assist the return of the diver to shore or boat while documenting return PSI and maximum depth of dive.
11. Conduct post-dive check out and neurological exam.

13.17 DUTIES OF BACK-UP DIVER/RESCUER

1. Perform primary function as safety/back-up diver for primary diver.
2. Maintain operational readiness to perform primary function within a relatively close proximity to primary divers entry point in or near the water.
3. This individual will be fully dressed and ready for a rapid entry into the water should the primary diver signal for help or that he found the object.

13.18 SEARCH PATTERNS

13.18.1 Shore Based Patterns:

- A. Sweep pattern - two hundred (200') feet water rescue line

- B. Parallel pattern - two hundred (200') feet water rescue line
- C. Snag pattern - two hundred (200') feet water rescue line

13.18.2 Boat Based Pattern:

- A. Expanding circles - two hundred (200') feet water rescue line

13.19 LINE PULL SIGNALS

13.19.1 Line pull signals and their meanings are as follows:

Tugs	Line tender to diver	Diver to line tender
1	OK ?/!	OK ?/!
2	Reverse direction or Take more line	Need more line
3	Come to surface	Victim or object located
4	Stop or possible danger overhead	Diver needs assistance

13.20 RESCUE OPERATION - UPON LOCATING THE VICTIM

13.20.1 The diver shall provide the proper signal to the line tender while maintaining control of the victim.

13.20.2 The line tender shall discreetly notify the team leader while assisting the diver and victim back to shore.

13.20.3 The dive team leader will notify the paramedic personnel at the scene.

13.20.4 The quickest possible route to emergency medical personnel shall be taken with the victim.

13.21 RECOVERY OPERATION - UPON LOCATING THE VICTIM OR OBJECT

13.21.1 The diver shall provide the proper signal to the line tender.

13.21.2 The line tender shall advise the team leader of the development.

13.21.3 The diver shall secure the search line to the victim or object.

13.21.4 The diver shall return to the line tender following the contour of the land.

13.21.5 The diver shall brief the line tender and the team leader of his findings, relying on the advise of the divers.

13.21.7 The team leader should assign a second dive team to stand by (back-up team divers) while the first dive team removes the victim or object.

13.21.8 A paramedic-staffed ambulance will be assigned to the pick up area.

13.22 VEHICLE RECOVERY OPERATION

13.22.1 The basic dive operation in the recovery mode is to be followed.

13.22.2 The following additions are:

13.23 DIVER FOULED - EMERGENCY SITUATION

13.23.1 Assessment of situation.

13.23.2 At such a time as the line tender receives "diver in trouble" signal, four (4) or more tugs. Or if diver does not respond to one (1) tug signal. Or if, at the line tender discretion that something is wrong.

13.23.2 The safety diver shall be deployed immediately.

13.23.4 The safety diver will follow the line to the distressed diver, he/she should approach expediently but cautiously as not to become fouled himself.

13.23.5 The safety diver shall assess the situation and check the following:

Air Supply

- A. Is the diver breathing?
- B. Remaining air supply if visible
- C. Equipment functioning properly (regulator free flow, restricted, or damaged air lines)
- D. Octopus available

Diver Disposition

- A. Breathing rate (hyperventilating)
- B. Possible injuries
- C. Mental state (degree of panic)

13.23.6 The safety diver should attempt to ascertain the problem and assist with the solution. If unable to assist, attempt to calm and reassure the distressed diver while assessing the degree and nature of the problem as:

- A. Severely entangled
- B. Trapped beneath an object
- C. Severely injured and unable to ascend

13.23.7 The safety diver shall return to the surface after assessment if he is unable to assist or free troubled diver. He/she shall report findings to team leader and Incident Commander.

13.24 UPON DEPLOYMENT OF SAFETY DIVER

13.24.1 The Incident Commander or team leader shall setup and consider the following:

1. Immediately order a back up air supply to be set up and ready two (2) additional divers. They should be the most experienced divers available and be equipped with under water communications if available.

2. Check air status from line tender:
 - A. Time of divers last air check
 - B. Amount of air at last check
 - C. Rate of consumption
 - D. Approximate out of air time
3. Back up air supply; if divers air supply is critically low, less than 750 PSI, send safety diver back with a single tank and regulator.
4. Consider water temperature and exposure time to assess for possible hypothermic conditions.
5. If diver has experienced an injury, the paramedic unit will be notified of the divers condition and be made ready.
6. Determine plan for freeing diver based on the report from the safety diver.
7. Have location, access and information on nearest hyperbaric chamber.

13.25 TRANSPORTING INJURED DIVER

13.25.1 If diver is conscious or breathing always administer 100% oxygen.

13.25.2 If the diver is unconscious, position diver horizontally on his/her left side to prevent aspiration.

13.25.2 Maintain an open airway, prevent aspiration.

13.25.4 If convulsions occur do not restrain, attempt to protect from further injury and support the head.

13.25.5 Protect the diver from excessive cold, heat, wetness and noxious fumes.

13.26 TERMINATION OF OPERATIONS

13.26.1 The Incident Commander, the dive team leader or their designee shall conduct a full debriefing following each operation.

13.26.2 Perform primary and neurological survey of all divers involved in the operation.

13.26.3 Critique the operation.

13.26.4 Stress management to be considered for all personnel.

13.26.5 Assure decontamination of all equipment and place back in service as soon as possible.

13.26.6 Insure completion of all reports (incident, witness and scene sketches).

13.26.7 All personnel shall immediately report any physical problem i.e. injuries, any symptoms of a hyper baric disorder or any equipment malfunctions to the dive team leader.

Appendix J

Wellesley Fire Department SOP 101.01

Wellesley Fire Department Standard Operating Procedures**Section 100: Rules and Regulations****Subsection 101: Written Departmental Documents Structure and Content****SOP 101.01: Standard Operating Procedures and The Standard Operating Procedures Manual, Structure and Content** (Written 3/03).

I. Scope: This standard regulates the overall structure of the Standard Operating Procedures and the organization of a Standard Procedures Manual. This standard was developed to provide a logical method of organizing individual standards and to organize a collection of standards in a generalized category, then to subcategories, to very specific procedure titles and specific details of the nature of any standard.

II. Procedure: All SOPs must be approved by the Chief of the department for their content and assignment to a specific category within the operating procedures manual. The organization of the general categories of SOPs will begin with the first three digits to indicate a category as follows:

100 Rules and Regulations

200 General Administration

300 Hazardous Materials

400 Occupational Safety and Health

500 Maintenance

600 Emergency Operations
700 Emergency Medical Services
800 Communications
900 Fire Prevention

Upon the selection of a general category, an appropriate subcategory will be selected and identified by the 99 available subsections that can be generated by adding a digit to the initial category number such as 101. An SOP, located in Section 100: Rules and Regulations, can become a subcategory under Section 100, as SOP 101.00: Standard Operating Procedures and the Standard Operating Procedures Manual, Structure and Content. Additional numerals after the decimal point can be used to create additional categories under the subcategories to allow for increased specificity of a procedure.

III. Responsibilities: It is the responsibility of the chief of the department to maintain the SOP manual in an organized manner. It is the responsibility of the chief of the department to require all SOPs be assigned a category and to have the necessary components of an SOP when necessary including the following:

1. Title - a descriptive explanation of the SOP.
2. Scope - the parameters of the topic to be addressed.
3. Purpose - states the function the SOP is to accomplish.
4. Procedure - a chronological list of required actions to accomplish a purpose.
5. Responsibilities - the assignment of specific actions or functions to be taken by specific personnel.
6. Definitions - explanation of any unique words, titles or

phrases.

7. General – any necessary general information to explain any aspects of an SOP not covered by the above sections of the SOP.
8. Revision dates – document to have the last revision date to insure the standards are reviewed to keep pace with any need for modification.

Appendix K

General Order 2000-18



TOWN OF WELLESLEY

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FIRE DEPARTMENT

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March 24, 2003

General Order # 2000-18

SOP 101.01: Standard Operating Procedures and Standard Operating Procedures Manual, Structure and Content (Written 3/03).

This General Order officially recognizes the attached documents identified as SOP 101.01, which establishes the structure and content requirements for Standard Operating Procedures and the organization of a Standard Operating Procedures Manual. This standard was developed to provide a logical method of organizing individual standards and to organize a collection of standards.

All SOPs must be approved by the Chief of the Department for their content and assignment to a specific category within the manual. The Standard Operating Procedures Manual is designed to provide specific procedural information and not intended to replace “ General Orders or Notices”. This is an effort to provide an effective tool for coordinating the responses of the department to enhance safety, operations, and efficiency.

Kevin K. Rooney, Fire Chief

Deputy Fire Chief _____ Fire Prevention Captain _____

	Captain	Lieutenant			
<u>Group A</u>	_____	_____	_____	_____	_____
<u>Group B</u>	_____	_____	_____	_____	_____
<u>Group C</u>	_____	_____	_____	_____	_____
<u>Group D</u>	_____	_____	_____	_____	_____