

Guidelines for Training Evolutions in Acquired Structures

SECTION 1. Purpose:

To establish guidelines that governs the actions of MCFRS personnel during the acquired structures process and while training in acquired structures, which will help maintain safety while gaining valuable training.

SECTION 2. Applicability:

All MCFRS personnel participating in acquired structure training (AST).

SECTION 3. Background:

Training in acquired structures is an important aspect of our all-hazards training approach as it allows us to impart risk management principles that provides a safe training environment while gaining experiences that are difficult to replicate. Acquired Structure Training (AST) (the training that takes place in an acquired structure) provides valuable hands-on training for MCFRS personnel that cannot be replicated with the structures located on our fixed facility at the PSTA. The value of AST is that it provides a level of realism in training that cannot be replicated in a fixed facility (i.e., the same buildings limit training scenarios and do not provide a realistic experience). These structures are an incredible learning platform that allows our training to be adaptable and scalable to meet our training needs. The AST program is designed to serve two platforms, training, and education (teaching). The level of complexity of the training plan and whether the training is designed to build on existing knowledge or impart new knowledge (educate/teach) will dictate the requirements of the AST (i.e., level of instructor, safety officer).

Overall management of the Acquired Structure Program resides with the Public Safety Training Academy (PSTA).

The MCFRS AST program's number one goal is to provide quality, realistic training that aligns with our Operational Doctrine Statement (ODS) and also addresses important Risk Management principles that adhere to the highest level of safety possible, for both the property owner and our personnel.

The risks associated with AST are more minimal than those present when conducting fire/rescue operations during true emergencies. The difference between AST and true operations is that there is plenty of time to identify, control, and mitigate the risks associated with AST, which are handled during the planning phase. Personnel who will be training in an acquired structure should be involved to the greatest extent possible in all phases of planning, which will not only help to greatly minimize risks to MCFRS personnel and the public, but also impart a culture of safety within the MCFRS organization. These guidelines will help ensure a

safe and productive training environment that yields greater efficiency, effectiveness of organizational objectives via leadership, teamwork, and good decision making based on crew resource management.

While Acquired Structure Training (AST) is a beneficial tool for reinforcing skills, it does come with some risks that need to be addressed. The risks will be dependent upon each structure and the type of training we conduct, which is further dictated by the building type, construction, training plan and project timeline. Although we accept all types of buildings, we will always operate under the premise that the building is more than reasonably safe. Therefore, if a building cannot be made more than reasonably safe then we will not accept it for training. Although AS buildings are going to be torn down, we will reject buildings (regardless of non-destructive or destructive training) that are structurally unsound to the point of being hazardous, infested with rodents, other sanitary risks that would put our personnel at harm, or any other situation that would deem the building unsafe for our personnel.

SECTION 4. Definitions:

- a. **Acquired Structure** – Any structure, parcel of land, object, or equipment, not originally constructed for training, that is made available to MCFRS for use as a training medium for personnel.
- b. **AST Program Manager** – A role of the In-Service Training Coordinator (ISTC) which requires the day-to-day oversight of the Acquired Structure Program. The AST Program Manager also oversees the administrative and training preparation of a site for acquired structure training.
- c. **AST Project Manager** – The AST Program Manager oversees the administrative and training preparation of a site for acquired structure training. This is the role of the Battalion Chief (BC) where the acquired structure is located. The BC can delegate responsibilities as he or she deems fit (i.e., communicate with the property owner/manager, gather paperwork, perform walkthrough, create training and safety plan, etc.)
- d. **AST Representative** – A role assigned by the AST Program Manager, either a BC or their designee, that aids in the administrative and training preparation of a site for AST. (i.e., communicate with the property owner/manager, gather paperwork, perform walkthrough, create training and safety plan, etc.)
- e.
- f. **Contract Indemnification Agreement** – An agreement between the County and the property owner that establishes MCFRS right of entry for training activities and the limits of any claims, actions, damages, liability, and expenses in connection with any loss of life, personal injury, or damage to property arising from any activities surrounding the training. **This is also referred to as a Hold Harmless agreement.**
- g. **Destructive Training** – Training in or on an acquired structure where damage will be caused or is expected. Examples of common fire rescue destructive training include forcible entry, breaching, roof ventilation, flowing water.
- h. **Hazard** - Any source of potential damage, harm or adverse health effects on something or someone.

- i. **Instructor**- An individual that with the responsibility to lead, oversee, and direct personnel based upon the approved training plan.
- j. **More than reasonably safe** – A AST structure can be considered more than reasonably safe when both the ASM and a County Safety Officer (CSO) have walked through the property, identified all possible safety hazards, all pre-determined safety hazards are effectively mitigated, a training plan is in place and approved by both the ASM and the CSO, a written safety plan is in place including required level of PPE needed for training.
- k. **Property safety inspection** – An inspection designed to review elements of a training structure and/or site to ensure the site is safe for training.
- l. **Non-destructive training**- Training that will not damage the property, these may include advancing a dry hose line, search techniques, ladder placement, apparatus positioning, building rope systems, etc.
- m. **Risk** - Expose (someone or something valued) to danger, harm, or loss.
- n. **Risk Assessment** - A systematic process of evaluating the potential risks that may be involved in a projected activity or undertaking.
- o. **Risk Control** - Assuming a risk, but taking steps to reduce, mitigate, or otherwise manage its impact or likelihood. There are three possible ways to control project risk: One may choose to avoid, accept, or mitigate the risk.
- p. **Risk Mitigation** - Taking steps to reduce adverse effects.
- q. **Safety Officer** – Individual responsible for monitoring and assessing hazardous and unsafe situations and developing measures to assure personnel safety. The Safety Officer will correct unsafe acts or conditions through the regular line of authority, although may exercise emergency authority to prevent or stop unsafe acts when immediate action is required. The Safety Officer maintains awareness of active and developing situations. The Safety officer ensures the site Safety and Health plan is prepared and implemented. The Safety officer ensures there are safety messages in each Incident Action Plan.
- r. **Scalable**- The ability to transition from a singular training objective to multiple training objectives based on the ability to transition from non-destructive to destructive training platforms.
- s. **Training Plan** – A document detailing the level of training, and the materials, number of participants, and number of instructors that are required for the acquired structure training. The Training Plan will also list the objectives for the training, and the skills and/or tasks that personnel will be performing.

SECTION 5. The Process: Acquiring a Structure:

The AST program will be managed by the Public Safety Training Academy (PSTA), under the Training Chief or his/her designee.

1. All people/agencies offering structures to MCFRS for AST shall be referred to the PSTA In-Service Training Coordinator.
2. Personnel must not engage in any training activities in an acquired structure until PSTA has inspected, approved, and prepared the structure for training.

- a. Acquired Structure Training is designed to be adaptable and scalable. Therefore, the resources required will be dependent upon whether the training is non-destructive or destructive and the level of complexity of the training plan.
- b. All Acquired Structure Training will adhere to the latest edition of policy 25-06, The responsibility of this falls on the BC, officers, and instructors overseeing the training. However, everyone is responsible for safety and should make any concerns known to officers and instructors.

SECTION 6. Responsibility:

All personnel.

SECTION 7. Procedure:

- a. Intake
 1. Personnel receiving information about an AST property may email or call the ISTC at the PSTA with the following information:
 - Name of owner/property manager
 - Address of AS property
 - Contact phone number
 - Expected demolition date
 2. Or use the intake form, available on Quicklinks via the PSTA Homepage.
 3. A flowchart is provided as attachment, which outline all required steps for both the property owner and the AST Project Manager or AST representative.
2. After receiving intake information, the PSTA will schedule an initial walkthrough of the structure with the ISTC, County safety officer, AST representative (designated by the BC), and the property owner/manager.
 1. Factors that may eliminate a structure from AST consideration include, but are not limited to: Structurally unsound buildings, safety factors that cannot be mitigated such as asbestos, short turnaround time, etc.
 2. The PSTA will conduct site visits of all AST properties to ensure they offer a safe training environment.
 3. Level of training, non-destructive versus destructive are a consideration when assessing each structure for the suitability and safety of training.
 4. During this step, the ISTC will ensure that the AST representative has and understands all necessary paperwork required to move forward.
- b. Inspection
 1. All structures being considered for AST shall be inspected by a County Safety Officer and the AST Manager (ISTC).

1. An initial inspection shall be conducted, which helps the PSTA make a solid determination on training suitability and provides the owner with items to be rectified prior to allowing training to take place.
2. A final inspection shall be conducted prior to commencement of training, which ensures items noted in the initial inspection were rectified and that the training plan and safety plan are appropriate.
3. All inspections shall be documented, with a copy kept at the training site during training.
4. **The Training Chief, or his/her designee, shall have the final authority to determine whether a structure, equipment, or site may be used for acquired structure training.**

c. Notification

1. When a structure is deemed suitable for training, the Training Chief, Deputy Training Chief, and the AST Project Manager (BC) shall be notified.

d. Management

1. The AST Program Manager (ISTC) shall collect all required documents and coordinate with the Montgomery County Attorney's Office to execute a Contract Indemnification Agreement (or hold-harmless agreement) between the property owner and the County.

1. **A hold-harmless agreement shall be executed and in-hand prior to any entry of fire rescue personnel upon or in the subject property for the purposes of preparation for training or training itself.**

2. The AST Project Manager for or each AS will be the Battalion Chief responsible for the battalion where the structure is located. This will help ensure that a span of control is exercised, so that there are not too many training structures in single battalion at a given time. Additionally, BCs on each shift may divide structures up per shift to ensure proper management and oversight of AST properties.

1. The AST Project Manager (BC) may assume all responsibilities of _____ the paperwork, training plan, and oversee training or assign personnel _____ to fill each role as he/she sees fit.

2. The AST Program Manager (ISTC) will provide the AST Project Manager with access to a Project Manager Packet, containing all necessary forms to participate in non-destructive and destructive training, dependent upon the PM's or his/her designee's intent for training.

3. Or, the AST Project Manager may access the documents online via the PSTA website.

4. If necessary or requested, the AST Program Manager may assign a subject matter expert to assist the PM in executing the training plan for an acquired structure.

3. The AST Project Manager will start a master copy of all required documents for *each* acquired structure that will be used for training.

1. All documents related to preparation of the structure (e.g., inspections, harmless agreement, demolition permit, floor plans, plot plans, and training must be maintained in the project file.
4. A copy of all documents will be forwarded to the ISTC so that a completed master project file can be kept on record for five years
 1. Completed documents: harmless agreement, proof of ownership (i.e., deed and clear title), NFPA 1403 inspection forms, site management form, plot plan, participant sign-in/gear-check sheets, weather documentation sheets, operational unit assignment sheet.
 2. *The AST Program Manager or PM may, at any time, request/ensure that additional AST forms are completed.*
 3. **The AST Program Manager, after consultation with the Training Chief or Deputy Training Officer, may cancel training at any time when it is determined that documentation is not in proper order according to this policy.**
5. The property owner will be given a Property Owner Packet (POP) by the AST Program Manager or Project Manager that at a minimum informs them of the AST process and gives a visual note of items required to prepare the site for training.
 1. The POP shall contain the following items: Property Owner Cover, Letter from the Training Chief, Notice of Inspection, Property Owner Checklist. (see appendices)
 2. When a PM is assigned, the AST Program Manager will make these items available to the PM.
 3. The AST Program Manager or Project Manager will assist the property owner through the AST process where necessary to prepare the structure for training.
 4. The AST Project Manager, or if requested the ISTC will work with the appropriate personnel to formulate appropriate training plans for the AST.
6. After a training plan is finalized, the AST Program Manager or PM will work with the appropriate section chief(s) to facilitate scheduling of personnel and apparatus for training.
7. The AST Program Manager may schedule staff/personnel to facilitate AST training, when needed.

1. The AST Program Manager may seek assistance from the Training Chief when necessary to assemble the required cache of equipment and instructors for needed for AST.
2. Whenever possible, instructors will be detailed to prevent any overtime.
 1. The Lead Instructor (officer, level 1, or level 2 instructor) shall be responsible for adhering to the training and safety plan that was pre-approved by the ISTC and the County safety officer.
 2. **All AST shall, at minimum, have an Officer and/or the appropriate level of Instructor assigned based on the type of training (non-destructive/destructive) and the level of complexity of the training plan.**
8. The AST Program Manager or Project Manager shall ensure a process or procedure is in place to maintain security of the immediate training area and Fire/Rescue equipment.
 1. The AST Project Manager will be responsible for the daily execution of the site security plan. This can be delegated as the AST Project Manager sees fit.
9. At the conclusion of training, the AST Project Manager shall formally turn the acquired structure over to the property owner or representative using a standard form.

SECTION 8: Attachments:

- Appendix A: Project Manager Packet Items
- Appendix B: Property Owner Packet Items
- Appendix C: Instructor Packet Items

SECTION 10. References:

None.

Appendix A: Property Manager Packet Items

- Guidelines for Training Evolutions in Acquired Structures
- Flowchart
- Hold Harmless
- Certificate of self-insurance
- Example training plan

Appendix B: Property Owner Packet Items

- Welcome Letter

Flowchart
Montgomery County Demolition Permit Information
Montgomery County Demolition Guidelines
Notice of Inspection
Property owner Checklist
Utility Information

Appendix C: Instructor Packet Items

Policy 25-06
Post Training Instructor Responsibilities