



Kentucky Fire Commission Minimum Training Standards And Administrative Spending

Research Report No. 495

Legislative Oversight And Investigations Committee

Kentucky Legislative Research Commission

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Kentucky Fire Commission Minimum Training Standards And Administrative Spending

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Abstract

This report examines the Kentucky Fire Commission's minimum training standards and administrative spending, specifically comparing its standards to national benchmarks and assessing its compliance with statutory spending limits. The commission's training standards consist of set instructional hours in various topics that the commission deems the minimum training needed for a firefighter to successfully complete the testing required to obtain an International Fire Services Accreditation Congress (IFSAC)-accredited certification. Staff analysis found the commission's IFSAC certification process compliant with national standards. However, the commission lacks the legal authority to require IFSAC certification for all local firefighters. Although its standards serve as benchmarks for program participation and funding access, the inability to enforce testing means the commission's minimum training standards do not guarantee full National Fire Protection Association compliance. Regarding the commission's finances, staff found the commission compliant with the 5 percent statutory spending limit on its annual Firefighter Foundation Program fund allotment. The other 5 percent statutory limit on administrative spending for specific programs outlined in KRS 95A.262 could not be audited because the Kentucky Community and Technical College System's accounting system does not track administrative expenses at the individual program level.

Foreword

Legislative Oversight and Investigations Committee staff extends its sincere appreciation to all those who contributed to this report. We are grateful to the executive staff of the Kentucky Community and Technical College System (KCTCS) for their assistance in understanding the relationship between the KCTCS and the Kentucky Fire Commission, and the KCTCS Fire Science degree program. The Kentucky Fire Commission staff provided invaluable information and were consistently responsive in compiling necessary data and accommodating interview requests. The Frankfort Fire Department staff offered valuable insights into firefighter training at the local level. The Finance Cabinet provided essential data regarding annual surcharge receipts and the historical performance of the Firefighter Foundation Program fund. Finally, LRC committee staff were an invaluable resource for understanding the budget process.

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Legislative Research Commission
Frankfort, Kentucky
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Summary

On March 6, 2024, the Legislative Oversight and Investigations Committee (LOIC) directed its staff to examine the Kentucky Fire Commission's (commission) administrative costs and appropriateness of its firefighter training. The commission, established under KRS 95A.020, enhances fire services statewide by establishing minimum standards for firefighter education, training, certification, and physical fitness. Governed by a 17-member board appointed by the Governor, the commission maintains accreditation from the International Fire Services Accreditation Congress (IFSAC), which ensures its certification programs align with nationally recognized standards. Administratively attached to the Kentucky Community and Technical College System (KCTCS), the commission retains autonomy over most of its finances and core functions.

LOIC staff reviewed the commission's minimum training standards and compared them with national standards and reviewed the finances from FY 2020 to FY 2024 to ensure the commission's compliance with statutory administrative spending limits.

Major Objectives

The major objectives for this study were

- to evaluate whether the commission's minimum training standards meet nationally-recognized best practices of the National Fire Protection Association (NFPA); and
- to determine if the commission is compliant with a 5 percent statutory administrative spending limit on its annual allotment from the Firefighter Foundation Program fund (FFPF), and an additional 5 percent cap placed on the administrative spending for programs listed in KRS 95A.262.

Major Conclusions

- The commission's IFSAC-accredited certification program complies with NFPA and has at its foundation the commission's minimum training standards. However, since the commission is not authorized to require local governments certify their firefighters, the commission's minimum training standards alone lack the certification testing needed to evaluate if firefighters possess the knowledge and skills required by NFPA standards.
- The commission reduced the number of training hours for certification because volunteer firefighters struggled to meet classroom requirements. While the commission is allowed to reduce hours, it did not follow all requirements to reduce the hours.
- The commission uses its minimum training standards as a prime eligibility requirement for local fire departments to access commission programs and funding.
- Statutes limiting administrative expenses do not provide a definition for administrative expenses. While the commission's interpretation of administrative expenses is reasonable, it may not match the General Assembly's intent.
- The commission is compliant with a statutory spending limit placed on its annual allotment from FFPF.

- LOIC staff were not able to determine whether the commission was compliant with administrative spending placed on funds it used for programs listed in KRS 95A.262 because KCTCS's accounting system does not account for administrative expenses by individual program.

Recommendations And Matters For Legislative Consideration

The commission's minimum firefighter training standards are based on 2019 NFPA guidelines, and consist of recommended instructional hours in various subjects to prepare for IFSAC-accredited certification testing. In 2023, the commission reduced the number of instructional hours in certain subjects and removed elective topics not directly linked to the 2019 standards. This change addressed concerns about volunteers having difficulty meeting the demands of the previous hours. Termed Basic I for volunteers and Basic II for paid firefighter, these certifications do not require the knowledge and skills testing necessary for IFSAC-accreditation certification.

While KRS 95A.240 allows the commission to modify training hour requirements through administrative regulations, a review indicates that the reduced hours for the new Basic I and II certifications have not yet been formally codified as legally required.

Recommendation 3.1

To comply with KRS 95A.240, the Kentucky Fire Commission should promulgate administrative regulations formally establishing the lower required training hours for both professional and volunteer firefighters based on specific standards of its new Basic I and Basic II certifications, in accordance with KRS Chapter 13A.

While the commission's knowledge and hands-on skills testing for IFSAC-accredited Firefighter I and II certifications aligns with NFPA standards, the commission lacks the legal authority to mandate IFSAC certification for all local firefighters. Although its standards serve as benchmarks for program participation and funding access, the inability to enforce testing means its minimum training standards do not guarantee full NFPA compliance. However, the commission's IFSAC accreditation provides external oversight by requiring an initial demonstration of adherence to NFPA standards, including evaluation and policy implementation, and a rigorous reaccreditation process every 5 years involving documentation review and an on-site peer evaluation to ensure ongoing compliance.

The commission's funding comes from general fund appropriations and a dedicated insurance premium surcharge. General fund dollars support State Fire Rescue Training (SFRT), while surcharge funds are legally restricted to specific programs with limits—capped at 5 percent of the annual surcharge and 5 percent of allocations for KRS 95A.262 programs—on administrative expenses reimbursed to the Kentucky Community and Technical College System. However, statutes do not provide a definition of “administrative expenses.” The commission considers operational costs related to core responsibilities to be administrative expenses. While this definition is reasonable, it may not match the General Assembly's intended use of funds.

Matter For Legislative Consideration 4.A

The General Assembly may wish to consider defining what is to be included in the administrative cost reimbursements to the Kentucky Community and Technical College System in KRS 95A.240(3) and KRS 95A.262(7).

Using the commission's definition of administrative costs, KCTCS administrative reimbursements were less than 5 percent of allocations every year from FY 2020 to FY 2024. LOIC staff could not confirm if the commission met the 5 percent limit for KRS 95A.262 programs. The commission's financials are managed by KCTCS and all transactions, not only those tagged under the "Administrative and Commission Expenses" category, are processed as a single reimbursement; therefore, the commission cannot isolate administrative and commission expenses specifically linked only to the programs listed in KRS 95A.262. Without this separation of expenses, LOIC staff could not confirm with certainty that the commission is meeting the statutory limit.

Recommendation 4.1

The Kentucky Fire Commission should work with the Kentucky Community and Technical College System to remedy its inability to separate the administrative cost of the commission programs listed in KRS 95A.262 in order to demonstrate compliance with KRS 95A.262(7).

Chapter 1

Firefighter Training

On March 6, 2024, the Legislative Oversight and Investigations Committee (LOIC) directed staff to examine administrative costs and appropriateness of firefighter training.

On March 6, 2024, the Legislative Oversight and Investigations Committee (LOIC) directed its staff to examine administrative costs and appropriateness of firefighter training. LOIC staff reviewed the Kentucky Fire Commission's (commission) minimum training standards, compared them with national standards, and reviewed the finances from FY 2020 to FY 2024 to ensure the commission's compliance with statutory administrative spending limits.

Background

The Kentucky Fire Commission (commission) was created to enhance fire safety and education through establishing training standards, providing training classes, fostering coordination among fire departments, and administering financial incentives.

The commission was created under KRS 95A.020 to enhance fire safety and education throughout the commonwealth by establishing minimum training standards, providing classes that adhere to those standards, fostering coordination among county and municipal fire departments, and administering various financial incentives to support local efforts. The commission was brought under the administrative umbrella of the Kentucky Community and Technical College System (KCTCS) in 2000. This move allowed the commission to leverage the college's existing infrastructure and widespread network of campuses and facilities, but also to retain significant financial and operational autonomy.

The commission's central office serves as the administrative hub, overseeing statewide firefighter training, certification, compliance, and funding programs. It helps fire departments across Kentucky align with national standards and advises on fire safety research and legislation.

The commission's 12 district offices focus on localized training and coordination, working directly with fire departments to implement state-approved programs and provide hands-on instruction. These regional offices make certain that firefighters receive practical training tailored to their specific communities.

Statute sets an annual 5 percent administrative spending limit on allotments from the Firefighter Foundation Program fund (FFPF) and a 5 percent restriction on administrative cost of certain programs.

Minimizing administrative overhead ensures dedicated funds have the greatest impact on frontline fire service operations. Statute places a 5 percent administrative spending limit on the annual allotment from the Firefighter Foundation Program fund (FFPF) to the commission and an additional 5 percent restriction on the

administrative cost of certain programs.¹ Adherence to this limit ensures that the intended beneficiaries receive the maximum possible benefit from these resources.

The commission is responsible for establishing minimum training standards but has no mechanism to enforce them, outside of eligibility for funding and support programs.

The effectiveness of Kentucky's fire service is linked to the competency and preparedness of its firefighters. The commission is responsible for establishing minimum training standards for firefighters. While these standards are not directly enforceable by the commission, they serve as foundational benchmarks that local fire department should strive to reach. These benchmarks are designed to make certain that firefighters possess the necessary knowledge, skills, and abilities to perform their duties safely and effectively. Meeting or exceeding these standards often serves as a key criterion for local fire departments to be eligible for certain funding and support programs administered by the commission. Given the dynamic nature of firefighting and the existence of nationally recognized best practices, particularly those established by the National Fire Protection Association (NFPA), it is essential to periodically evaluate Kentucky's training standards against these benchmarks to identify areas of alignment and potential improvement.

Major Objectives

This report had two major objectives related to administrative spending and minimum training standards.

To ensure fiscal accountability and the maintenance of high-quality firefighter training within the Commonwealth, this study focused on the following major objectives:

- Determine if the commission is compliant with a 5 percent statutory administrative spending limit on its annual allotment from the FFPPF and with the additional 5 percent cap placed on the administrative spending for programs listed in KRS 95A.262.
- Evaluate whether the commission's minimum training standards meet nationally-recognized best practices of the NFPA.

Study Scope

The scope for this study was FY 2020 to FY 2024.

The financial portion of this study provides an overview of commission revenues and expenditures from FY 2020 to FY 2024. Detailed analysis was limited to determining whether the commission is compliant with the 5 percent administrative spending caps for certain dedicated funds.

An assessment of whether the commission's minimum training standards align with or surpass NFPA necessitated a detailed review of the NFPA's standard development and maintenance processes, alongside an examination of how the commission utilizes NFPA job performance requirements to shape curriculum and evaluation methods. The analysis encompassed the period from FY 2020 to FY 2024, and considered relevant changes to both NFPA standards. Notably, while new NFPA standards consolidating and streamlining previous requirements were issued in August 2024, the older standards remained active during the period studied and therefore form the basis of this analysis. Kentucky will transition to these 2024 NFPA standards for firefighter qualifications on July 1, 2025.

Major Conclusions

This report has six major conclusions.

This report has six major conclusions.

- The commission's International Fire Services Accreditation Congress (IFSAC)-accredited certification program complies with NFPA and has at its foundation the commission's minimum training standards. However, because the commission lacks authority to require local governments to certify their firefighters, it cannot evaluate if firefighters possess the knowledge and skills required by NFPA standards.
- The commission reduced the required number of training hours for certification because volunteer firefighters struggled to meet classroom requirements. While the commission is allowed to reduce hours, it did not file an administrative regulation as required by law.
- The commission uses its minimum training standards as a prime eligibility requirement for local fire departments to access commission programs and funding.
- Statutes limiting administrative expenses do not provide a definition for *administrative expenses*. While the commission's interpretation of administrative expenses is reasonable, it may not match the General Assembly's intent.
- The commission is compliant with a statutory spending limit placed on its annual allotment from FFPPF.
- LOIC staff were not able to determine whether the commission was compliant with administrative spending placed on funds it used for programs listed in KRS 95A.262 because KCTCS's accounting system does not account for administrative expenses by individual program.

Structure Of This Report

Chapter 2 provides the background needed to fully understand LOIC staff's analyses and conclusions. It reviews the role and responsibilities of the commission and local governments in providing fire protection services across the state. It reviews how the commission classifies fire departments and outlines the programs available to department and firefighters when they reach various degrees of compliance with the commission's minimum training standards.

Chapter 3 details the creation and organization of NFPA standards. It then discusses how the commission translates these guidelines into teachable units with recommended minimum instructional hours as part of its IFSAC-accredited certification process. Staff analysis focuses on determining compliance with NFPA standards as part of the commission's IFSAC-certification process.

Chapter 4 provides a financial overview of the commission and compares administrative costs to the two statutory 5 percent limits. It provides major revenue and expenditure categories for the commission, a discussion of administrative costs, expenditures for specific programs, and expenditures and revenues for the State Fire Rescue Training.

Chapter 2

Fire Departments And Firefighter Training

The Kentucky Fire Commission establishes minimum standards for firefighters' education, training, certification, and physical agility. Though administratively attached to the Kentucky Community and Technical College System (KCTCS), the commission operates with significant autonomy, guided by a 17-member board representing various stakeholders.

Established under KRS 95A.020, the Kentucky Fire Commission enhances fire safety throughout the state by setting minimum standards for firefighters' education, training, certification, and physical agility.² Although administratively attached to the Kentucky Community and Technical College System, the commission maintains significant autonomy in its finances and core functions. It is governed by a 17-member board, representing stakeholders from fire services, local government, medical field, industry, emergency management, and the general public, along with ex officio and non-voting members.^a This board oversees the commission's activities and holds the final approval authority over training standards.³

The commission is accredited by the International Fire Service Accreditation Congress (IFSAC), which validates its certification programs, confirming compliance with National Fire Protection Association (NFPA) standards. As an accredited body, the commission must follow IFSAC policies, including administering a two-part exam for certification.

The commission is accredited by the International Fire Service Accreditation Congress, which formally recognizes and validates the commission's certification programs. This accreditation confirms that the commission complies with stringent requirements, including alignment with the job performance standards of the National Fire Protection Association, which sets the national standards for firefighters. It also allows certified firefighters to prove their qualifications, advance their careers, and maintain professional credibility.

As an IFSAC-accredited body, the commission adheres to IFSAC policies in its certification process. A key requirement is the successful completion of a two-part examination, administered by a certified instructor, encompassing a knowledge-based multiple-choice test and a practical physical assessment demonstrating competency in NFPA-defined essential skills. Upon passing both, the firefighter receives the IFSAC certification for which they applied.

The commission's certification process aligns with NFPA, but it cannot mandate IFSAC certification. Instead, the commission uses its minimum standards as benchmarks for local departments to access funding and programs.

Staff analysis confirms that the commission's certification process aligns with NFPA standards. However, the commission lacks the authority to require IFSAC certification for local fire departments. Instead, it leverages its authority to set minimum knowledge requirements for program participation, effectively using its list of required classes for certification testing as a benchmark that local

^a As of this report's publication, the Kentucky building and safety association seat on the Kentucky Fire Commission was vacant.

fire departments can strive to achieve in order to have access to commission funding and programs.⁴

Given the complex relationship between the commission's authority and local governments' control over their own affairs, this chapter provides the background needed to fully understand staff's analyses.

Establishing Fire Departments

KRS offers various chapters under which local fire departments can organize. Departments must apply to the commission for official recognition.

Kentucky grants significant autonomy to local governments in establishing and managing their fire departments. These local entities are responsible for organizing, funding, staffing, training, and operating their fire services. Municipal and local governments have several options for organizing firefighting services depending on the specific needs, governance preferences, and operational goals of the community or county.

- Fire departments can be governed by a fiscal court.⁵ This option allows for direct integration with other county government operations and streamlining funding and resources through county budget processes.
- Fire departments can be established in cities, allowing for municipal control of funding through city taxes.⁶
- Fire departments can operate as nonprofit organizations.⁷ They often rely on community support, donations, grants, and limited state dollars.
- Fire districts can be independent entities with their own taxing authority, providing a dedicated revenue stream for fire services.⁸
- The commission also recognizes industrial fire brigades, which are typically organized and operated by private industries to protect their facilities.^b

To establish a new fire department that is officially recognized by the commission, a local government must submit an application.⁹ This application requires them to specify the KRS chapter under which they will operate, provide a written description of the proposed service boundaries, and include a map clearly illustrating those boundaries.¹⁰ Official recognition by the commission opens access to state funding and programs, which are discussed in more detail later in this chapter.

^b These brigades are governed by OSHA Standards 1910.156, with OSHA standards established at the state level by 803 KAR 2.300.

Staffing Fire Departments

Local governments can staff fire departments with professional firefighters, volunteers, or a combination of both. The commission classifies departments based on the ratio of volunteer to paid firefighters.

Local governments have the flexibility to staff their fire departments using a variety of models, either employing professional firefighters, relying entirely on volunteers, or implementing a hybrid approach. Statute defines a full-time paid firefighter as an individual who receives a minimum salary of \$8,000 annually and who works a minimum of 2,080 hours per year as an employee of a fire department recognized by the commission.¹¹ Volunteer firefighters receive either no salary or a salary of less than \$8,000 annually for their services, but must work for a recognized fire department.¹²

Fire Department Types. The commission uses the proportion of volunteer to full-time paid firefighters as a means of classifying departments as a volunteer fire department or a paid fire department. Each is defined as follows:

- Paid fire department—A fire department recognized by the commission, of which at least 50 percent of its firefighters are full-time paid firefighters.
- Volunteer fire department—A fire department with a minimum of 12 members and a chief, at least one operational fire apparatus, with fewer than 50 percent of its firefighters being full-time paid firefighters.¹³

In 2024, the commission recognized 684 fire departments: 632 volunteer and 52 fully paid.

According to the commission's 2024 annual report, Kentucky had 684 recognized fire departments: 632 volunteer departments, 52 fully paid departments. As shown in Table 2.1, volunteer departments account for over 90 percent of Kentucky's fire services for the past five years, while paid departments represent less than 10 percent.¹⁴

Commission staff said the number of volunteer fire departments has decreased over time due to mergers and believe the high 2023 count was an anomaly.¹⁵

Table 2.1
Number And Types Of Fire Departments
2020 To 2024

Department Type	2020	2021	2022	2023	2024
Volunteer	645	621	617	711	632
Paid	51	52	51	52	52
Total	696	673	668	763	684

Note: The Kentucky Fire Commission's annual reports separately list "Combination departments," which have been incorporated into volunteer departments for this table because they are an internal designation for a specific kind of volunteer department. Source: Kentucky. Fire Commission: *Kentucky Fire Commission FY2020 Annual Report*; *Kentucky Fire Commission FY2021 Annual Report*; *Kentucky Fire Commission FY2022 Annual Report*; *Kentucky Fire Commission FY2023 Annual Report*; *Kentucky Fire Commission FY2024 Annual Report*. nd. Web.

Training Firefighters

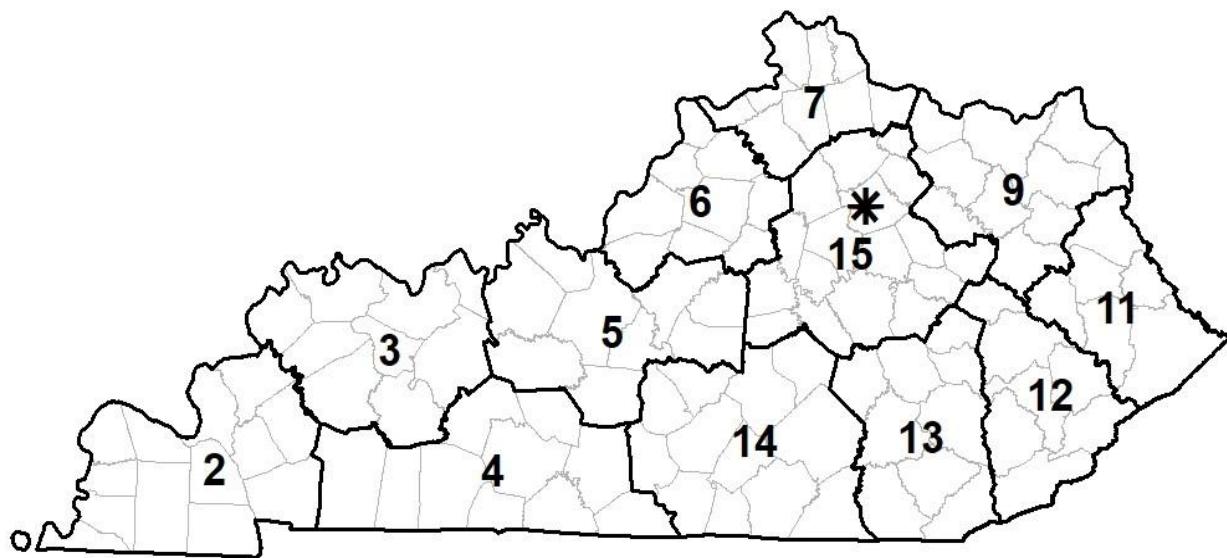
The commission provides 21 hours of free training annually to recognized departments. Other training can be acquired in various ways, including through the commission's State Fire Rescue Training (SFRT) branch, training academies throughout the state, or certified instructors employed by local fire departments.

Recognized fire departments receive 21 hours of free training annually from the commission, while retaining the authority to set their own training protocols and obtain training from other sources. Adherence to the commission's minimum training standards carries significant benefits, particularly regarding eligibility for various commission programs designed to support local departments. This section explores the available training options, detailing their intended purposes and the connection between training compliance and program eligibility.

State Fire Rescue Training

The commission's training branch, called State Fire Rescue Training (SFRT), delivers basic and advanced firefighter training through its 12 district offices, as shown in Figure 2.A. Each district office staffs a training coordinator who works with local departments to ensure needed classes are available. Contact information for each training coordinator is available on the commission website, and several of the district offices have websites where local fire departments can request classes. Updated class schedules are also posted on the commission website. This coordinated approach is intended to help firefighters get needed training.¹⁶

Figure 2.A
State Fire Rescue Training District Offices



Note: State Fire Rescue Training does not have districts 1, 8, or 10. * = Central office location for the Kentucky Fire Commission, located in Paris.

Source: Kentucky. Fire Commission. “SFRT District Offices.” nd. Web.

Training Academies

A comprehensive training academy located in Greenville is the commission’s main academy, providing basic and advanced firefighter training. Other academies throughout Kentucky offer training and specialized courses.

The commission operates a comprehensive training academy in Greenville that provides standardized basic and advanced firefighter training. Complementing this academy are several metropolitan-operated firefighter training academies, such as those in Lexington and Louisville. These academies often concentrate on providing initial training for new recruits, equipping them with foundational certifications and practical skills. Regional training academies, sometimes established through collaborative initiatives, offer specialized courses catering to broader geographic areas and addressing specific needs, such as aircraft rescue.¹⁷

Local Fire Department Certified Trainers

Level I Instructors can provide training using curricula approved by the commission. Level II Instructors can provide training across multiple agencies and can develop their own coordinator-approved curricula.

The commission administers a certification process for fire instructors through a tiered system. Level I instructors are certified to provide training at any fire department in the commonwealth using curricula approved by the commission. Level II instructors, who have a more advanced certification, are authorized to teach any commission-approved curriculum across multiple agencies and to develop their own curricula, provided that it has been approved by the commission’s curriculum/degree program coordinator as meeting NFPA standards.¹⁸ This framework ensures a qualified

cadre of trainers at both local and regional levels. As of March 2025, 34 percent of all firefighters in Kentucky had either Fire Instructor I or II certifications.¹⁹

Other Training Options

Other training opportunities are available through collaborative agreements with entities like the Blue Grass Airport Regional Aircraft and Firefighting Training Center. SFRT offers some classes virtually and approves online providers of firefighter curriculum as NFPA compliant.

Some organizations, such as the Kentucky Firefighters Association and various regional fire associations, offer training opportunities through workshops, conferences, and specialized educational programs. Collaborative endeavors, exemplified by the Blue Grass Airport Regional Aircraft and Firefighting Training Center, provide access to unique training facilities and specialized expertise that might otherwise be unavailable. One such specialized program is the Basic Aircraft Rescue Firefighting course, which equips firefighters with essential skills for handling aviation emergencies, including fuel spill containment, interior fire suppression, and passenger rescue techniques.

The commission approves online providers whose curricula meet its NFPA standards, and SFRT delivers virtual instructor-led training. This approach enhances flexibility and accessibility for continuing education, making certain that firefighters stay up to date with evolving best practices and industry standards.

KCTCS has a Fire Science degree program that operates separately from the commission, but whose curriculum must be approved by the commission as being NFPA compliant.

KCTCS has a Fire Science degree program that follows a set curriculum, much like any other academic program within the college system. The commission plays a regulatory role by ensuring this curriculum meets the NFPA standards, but does not administer the degree program. Neither KCTCS nor program students receive commission dollars for the degree program.

Advantages Of Adhering To Commission Training Standards

While local fire departments manage their own training, meeting the commission's minimum training standards provides access to valuable commission-sponsored programs and resources.

While local fire departments retain the autonomy to set their own training protocols and select their own training providers, adhering to the commission's minimum training standards offers these departments significant advantages. Eligibility for commission-sponsored programs is often tied to meeting its standards, and fire departments that prioritize these standards can better leverage the commission's broader initiatives.

The commission provides various programs that support local fire departments and firefighters. As fire departments and individual firefighters meet the commission's minimum training standards, they become eligible for more resources. The varied programs the

commission offers are relative to the degree of compliance with commission minimum training standards.

Formal Commission Recognition

The commission offers six programs to recognized fire departments regardless of their compliance with the commission's minimum training standards.

The commission offers several programs to any fire department that has filed the proper paperwork upon establishment, regardless of their compliance with the commission's minimum training standards. Currently, seven programs are available to any fire department recognized by the commission.

Alan “Chip” Terry Professional Development And Wellness Program. This program provides seminar-based peer support and counseling services to reduce negative mental and behavioral health outcomes.²⁰

Cancer Screening Program. This recent program reimburses firefighters for cancer screenings. The initiative aims to improve the health and safety of firefighters through early cancer detection.²¹ The program will be governed by specific administrative regulations that the commission is in the process of filing.²²

Driver/Operator Program. The program focuses on safe and effective operation of emergency vehicles by providing defensive driving tactics training.²³

Hepatitis A And B Program. The commission provides Hepatitis A and B vaccinations for all volunteer and professional firefighters associated with a commission-recognized fire department.²⁴

WMD/HazMat And Response To Terrorism Program. This program provides training to prepare emergency service personnel for man-made and non-man-made threats.²⁵

Firefighter PTSD Program. This program addresses post-traumatic stress disorder (PTSD) among firefighters by providing necessary resources and support to those affected by the emotional and psychological toll of their duties.²⁶

Half Of Firefighters Trained

Nine programs are available to fire departments where at least 50 percent of firefighters meet the commission's minimum training standards for completed instructional hours.

The next level of recognition is related to the amount of training firefighters have within departments. Nine programs are available to fire departments who are compliant with the commission's standards. Once 50 percent of any recognized fire department's firefighters have completed all training hours, the following commission programs become available.

State Aid Program. This program provides annual financial assistance to qualifying volunteer departments to support their operations and training. The commission allows first-time applicants to participate when at least 50 percent of its firefighters have completed one-half of the required training hours within six months of application; otherwise half of the departments firefighters must have completed all training hours.²⁷ The state budget has provided set amounts for the State Aid Program, with the FY 2023-2024 budget allocating \$11,500 in aid for each fiscal year and the FY 2025-2026 budget allocating \$15,000 in aid for each fiscal year.²⁸

Health Insurance And Worker's Compensation. Compensation and other benefits are provided for volunteer firefighters in the event of work-related injuries or illnesses and has the same first-time reduction in training hour requirements as does the State Aid Program.²⁹

Hazardous Material Reimbursement Program. The program reimburses volunteer fire departments for equipment lost or damaged beyond repair due to hazardous material incidents.³⁰

Low-Interest Loan Program. Loans are available to volunteer fire departments at a 3 percent interest rate for purchasing equipment or constructing facilities. Departments must maintain State Aid eligibility for the full duration of the loan to remain eligible.³¹

EMS Training And Equipment Program. This program focuses on providing training for Emergency Medical Services (EMS) providers and ensuring they are equipped with the latest practices and technologies. Continuing education is a key component of this program, which allows EMS personnel to remain updated with evolving protocols.³²

Mobile Facilities Program. This program is designed to provide mobile units equipped with the necessary resources to establish

simulated emergency operations centers. These facilities support training and preparedness exercises for emergency responders, enhancing their readiness for real-world scenarios.

Technical Innovations Program. Through this program, financial assistance is available to help fire departments acquire thermal vision devices. Departments must be recognized by the commission and submit an application for review, ensuring compliance with statutory requirements.

Personal Protective Equipment Program. This program ensures annual evaluations of equipment, physical examinations for instructors, and the provision and replacement of protective gear to meet NFPA guidelines.³³

Training Facilities Grant Program. This program allocates funds for improving or expanding training facilities for fire departments recognized by the commission. As specified in KRS 95A.262(3), \$200,000 is allocated per fiscal year to this fund. Departments need to submit an application detailing their project, which will be reviewed by the commission staff and sent to the commission board for final for approval. The program has been increased through budget bills, with the FY 2023-2024 budget increasing it to \$500,000 and the FY 2025-2026 budget increasing it to \$1 million.³⁴

All Firefighters Trained

Certified professional firefighters who meet in-service training requirements can receive a \$4,000 annual bonus through the Incentive and Pension Program. The incentive was increased to \$4,429 for FY 2025 and \$4,562 for FY 2026.

Lastly, professional firefighters employed by a recognized department who have completed all training hours become eligible for the Incentive and Pension Program. This program provides an annual supplement of \$4,000 to each qualified professional firefighter who works at least 2,080 hours per year and has met the commission's minimum training standards, including annual in-service training.³⁵ The incentive pay has been increased through the state budget bills, with the incentives increased to \$4,429 per year for FY 2025 and \$4,562 for FY 2026.³⁶

Chapter 3

Fire Commission Standards Follow National Guidance

The Kentucky Fire Commission's minimum training standards are an important part of its certification process, which aligns with national standards. However, the commission lacks authority to mandate local governments certify all their firefighters, so its minimum training standards alone lack the knowledge and skills testing required of the National Fire Protection Association.

The Kentucky Fire Commission bases its minimum training standards on the National Fire Protection Association guidelines. These nationally recognized standards outline best practices for firefighter training, equipment use, safety procedures, and emergency response. The commission employs a formal process to translate NFPA requirements into statewide training standards and associated knowledge and skills testing for certifications. Staff analysis concluded that the commission's minimum training standards are an important part of its certification process, which aligns with NFPA. However, the commission does not have authority to demand local governments certify all their firefighters, leaving the commission unable to judge whether firefighters have acquired all the knowledge and skills required of the NFPA.

This chapter examines how NFPA creates its standards and how the commission translates those into state minimum training standards; it then evaluates whether the commission's recommended training aligns with NFPA. This chapter makes one recommendation regarding an administrative regulation the commission needs to file to comply with statute.

National Fire Protection Association Standards

NFPA is a global non-profit that creates fire safety standards. In 2024, it consolidated several standards into NFPA 1010, which Kentucky plans to adopt in July 2025, succeeding the 2019 standards that the state currently follows.

NFPA is a globally recognized non-profit organization dedicated to developing and maintaining fire safety standards, codes, and guidelines. In 2024, it published *NFPA 1010: Standard on Professional Qualifications for Firefighters*, consolidating multiple previous standards—including *NFPA 1001: Firefighter Professional Qualifications, 2019*—into a single, streamlined document.^{c 37} The commission plans to implement NFPA 1010 beginning July 1, 2025.³⁸ During the period reviewed by LOIC staff, the commission adhered to the then-appropriate 2019-standards, which outlined the qualifications for Firefighter I and II, focusing on essential firefighting skills, safety procedures, and operational readiness. The 2024 standards introduced a new

^c NFPA 1010 integrated NFPA 1001, NFPA 1002, NFPA 1003, and NFPA 1005 to include standards for support person, Firefighter I, Firefighter II, airport firefighter, land-based marine firefighter, and apparatus driver/operator.

certification called "Support Person," removed outdated requirements, and expanded training on modern firefighting tools like thermal imaging devices, but the core competencies for Firefighter I and II remained largely consistent.³⁹

These NFPA standards, including minimum job requirements (JPRs) they establish, are developed through a consensus-driven process involving fire service professionals and undergo rigorous review before approval.

NFPA 1001 establishes a series of minimum job requirements (JPRs), which outlines specific tasks an individual must be able to perform to be considered competent at a job within fire services. JPRs are developed through a consensus-driven process involving fire service professionals, safety experts, and industry leaders. A dedicated NFPA Technical Committee drafts and revises standards that undergo public review and are voted upon by the committee. The NFPA Standards Council is responsible for final approval of any new standards or changes to NFPA standards.⁴⁰

NFPA 1001 is organized with chapters outlining general firefighter duties and is further broken down into sections detailing specific JPRs and the necessary knowledge and skills. For example, Chapter 4 demonstrate the importance of knowledge and skills related to self-contained breathing apparatus (SCBA).

NFPA 1001 is structured like a book outline. Within each chapter, JPRs are grouped under section headings into categories of generalized firefighter duties. Each section details the specific JPRs, including the required demonstrable knowledge and skills. For example:

- Chapter 4: Fire Fighter I
 - Section: 4.3: Fireground Operations
 - Job Performance Requirement 4.3.1: “use self-contained breathing apparatus (SCBA) during emergency operations, given SCBA and other PPE, so that the SCBA is correctly donned, the SCBA is correctly worn, controlled breathing techniques are used, emergency procedures are enacted if the SCBA fails, all low-air warnings are recognized, respiratory protection is not intentionally compromised, and hazardous areas are exited prior to air depletion.”
 - Requisite Knowledge 4.3.1.A: “conditions that require respiratory protection, uses and limitations of SCBA, components of SCBA, donning procedures, breathing techniques, indications for and emergency procedures used with SCBA, and physical requirements of the SCBA wearer.”
 - Required Skill 4.3.1.B: “the ability to control breathing, replace passages, initiate and complete emergency procedures in the event of SCBA failure or air depletion, and complete donning procedures.”⁴¹

Chapter 4 of the standards specifies 28 foundational JPRs for Firefighter I across areas like fire behavior and suppression, while Chapter 5 of the standards builds upon this with 14 more JPRs for Firefighter II, emphasizing leadership and advanced skills.

Chapter 4 of the NFPA 1001 standards outlines the expectations for Firefighter I, listing 28 specific JPRs across four sections. This chapter indicates the foundational knowledge and skills a new firefighter should demonstrate, encompassing areas like fire behavior, personal protective equipment (PPE), hose operations, ladders, ventilation, and basic fire suppression. Building upon this base of foundational knowledge and skills, the guidelines and competencies for Firefighter II are expanded through 14 additional JPRs within five sections of Chapter 5. These standards emphasize the skills necessary for firefighters to assume greater leadership and responsibility, including incident command, advanced fire suppression, and support for specialized rescue operations.⁴²

Converting National Standards Into Kentucky Firefighter Training Standards

Adapting NFPA job performance requirements into state-specific training involves interpreting broad standards into actionable objectives. The International Fire Service Accreditation Congress requires the commission to submit correlation sheets that demonstrate how training and certification standards align to all NFPA requirements.

While NFPA JPRs provide a structured foundation for firefighter skills and knowledge, transitioning from these national standards to state-specific training programs is a multi-step process that requires careful adaptation. States must navigate challenges such as interpreting broad NFPA standards into actionable training objectives. The commission uses an appropriate process that combines JPRs into similar subjects.

The International Fire Service Accreditation Congress, the commission's accrediting body, requires documentation that the commission's training standards and certification process meet all NFPA requirements. For this, the commission submits correlation sheets that relate the topics covered in each subject to specific NFPA JPRs and that serve as a roadmap to illustrate to IFSAC how the commission systematically and comprehensively evaluates candidates against NFPA requirements.⁴³

The commission establishes instructional hours for NFPA-based training modules by evaluating recommendations from publishers like the International Fire Service Training Association alongside the commission's own analysis and local department's feedback.

To establish appropriate instructional hours for each subject, the commission turns to publishers of firefighter training materials who have already organized NFPA JPRs into structured lesson plans, such as the International Fire Service Training Association (IFSTA). These materials offer suggested instructional hours based on industry best practices. The commission evaluates these recommendations alongside its own analysis of past training programs and instructor feedback to determine the required number of training hours for each subject.⁴⁴ This approach ensures that Kentucky's firefighters receive adequate time to develop

An illustration of the commission's instructional alignment with NFPA JPRs is their requirement of six hours of training in personal protective equipment, including specific guidelines related to SCBA.

competency in each area before being tested on their knowledge and skills for certification.

As an illustration of how the commission's instructional modules align with NFPA JPRs, consider the commission's required six hours of instruction in personal protective equipment (PPE). One key area of knowledge addressed in that module pertains to self-contained breathing apparatus. This is in direct alignment with NFPA 4.3.1, which specifies that a firefighter should know the "conditions that require respiratory protection, use and limitations of SCBA, components of SCBA, donning procedures, breathing techniques, indications for and emergency procedures used with SCBA, and physical requirements of the SCBA wearer."⁴⁵ Furthermore, in this module, students learn the proper guidelines for checking and cleaning SCBA gear consistent with NFPA 4.5.1. This SCBA example represents one component; the 6-hour PPE module encompasses instruction aligned with numerous other NFPA 1001 JPRs beyond SCBA.

Training And Certification

To count toward certification, firefighting classes must be led by an IFSAC-certified instructor, registered and approved by the commission beforehand, and have student rosters submitted promptly. Upon successful completion, training hours are officially recorded in KyFIRES, the commission's online data management system.

For classes within each subject to count toward a certification, the student must be registered with and approved by the commission's Accredited Certification Office at least 30 days prior to the first day of the class, and the class must be led by an IFSAC-certified instructor. An initial roster of enrolled students must be emailed to the commission within 24 hours of the first class, followed by a final class roster submission within 48 hours after the class concludes. Following the successful completion of the approved course, the participating firefighter's training hours are recorded in KyFIRES, the commission's online system for managing firefighter training records, certifications, and department rosters. These entries in KyFIRES serve as the official record of completed training.

Firefighters can apply for IFSAC-Firefighter I or II or non-IFSAC-accredited Basic I or II certification. The commission introduced the Basic I and II certificates in January 2023 to address concerns that volunteers were struggling to meet the classroom-hour requirements, resulting in removal of electives and material not directly aligned with NFPA 1001.

Firefighters can apply to the commission for either an IFSAC-accredited Firefighter I or II certification or a non-IFSAC-accredited Basic I or II certification. The commission introduced these non-IFSAC certifications on January 1, 2023, as the new minimum training standards for volunteer (Basic I) and paid (Basic II) firefighters; these certifications lack IFSAC recognition because they do not require skills and knowledge testing.⁴⁶ Commission officials stated this change addressed concerns from fire departments that volunteers struggled to meet the classroom-hour requirements due to other life responsibilities, leading the

commission to reduce the required hours by removing elective topics and material not directly aligned with NFPA 1001 standards.

KRS 95A.240 authorizes the commission to reduce or offer alternatives to training hour requirements if the changes are established via administrative regulation. No regulations have been promulgated for Basic I and II.

KRS 95A.240 authorizes the commission to reduce or offer alternatives to these training hour requirements through a certification or equivalency-based testing, provided these changes are formally established via administrative regulations. While the commission adopted Basic I and Basic II, effectively lowering training hours for both volunteer and professional firefighters, a review of current administrative regulations indicates that these new, lower hour requirements have not yet been formally codified as required by KRS 95A.240.

Recommendation 3.1

Recommendation 3.1

To comply with KRS 95A.240, the Kentucky Fire Commission should promulgate administrative regulations formally establishing the lower required training hours for both professional and volunteer firefighters based on specific standards of its new Basic I and Basic II certifications, in accordance with KRS Chapter 13A.

Successful applicants for Firefighter I and II must pass a proctored written exam with a minimum score of 70 percent and demonstrate 100 percent competency in hands-on skills assessments evaluated by certified personnel. The commission does not test for its Basic I and Basic II certifications.

If a candidate applies for either an IFSAC-accredited Firefighter I or Firefighter II certificate, they must pass a written examination that assesses their knowledge of fire behavior, equipment usage, emergency procedures, and hazardous materials operations. These multiple-choice exams are proctored by State Fire Rescue Training instructors at accredited testing locations. A minimum passing score of 70 percent is required for certification. Firefighters must also complete hands-on skills assessments with 100 percent competency. These hands-on skills assessments are overseen by SFRT instructors who observe and evaluate a candidate's ability to perform essential firefighting tasks. The commission does not administer such testing for its Basic I and Basic II certifications.

The commission offers over 20 IFSAC-accredited certifications, including Firefighter I and Firefighter II.

While this analysis focused on Firefighter I and II and Basic I and II, the commission offers over 20 IFSAC-accredited certifications, encompassing basic skills to advanced and specialized training in areas such as Live Fire Instructor In Charge and Small Unmanned Aircraft. Although LOIC staff's analysis concentrated on the Firefighter I and II and Basic I and II certifications as the key benchmark criteria during the study period, the commission's website provides descriptions of the other certifications offered.

Commission Minimum Training Standards

The commission's recommended instructional hours form the basis of its certification process and essentially represent the state's minimum firefighter training standards.

The commission's list of recommended instructional hours across a range of essential firefighting subjects is the foundation of its certification process. The suggested hours represent the commission's expert guidance on the necessary depth of training to adequately prepare candidates for the rigorous certification testing. In essence, these recommended hours serve as the very framework upon which the state's expectations for firefighter competency are constructed, and are synonymous with what is widely recognized as Kentucky's minimum firefighter training standards.

Table 3.1 outlines these minimum firefighter training standards as they existed during the study period, presenting requirements for both volunteer and paid firefighters. Both the IFSAC-accredited Firefighter I and II certification and, the more recently introduced, non-IFSAC-accredited Basic I and II certification draw upon the same NFPA 1001 standards for Firefighter I and Firefighter II, requiring instruction in nearly all the same subjects.

Table 3.1
Comparison Of Commission Minimum Training Standards
Before And After The Introduction Of Basic I And II Certifications

Instructional Module	Before January 1, 2023		After January 1, 2023	
	150-Hour	400-Hour	Basic I	Basic II
Fire control	9	24	9	24
Drivers training	9	12	9	20
Fire hose, nozzles, and appliances	9	16	6	20
Personal protective equipment	6	16	6	20
Pumper operation and maintenance	6	12	6	20
Fire behavior	3	12	3	20
Forcible entry	3	16	6	12
Hazardous materials operations	12	12	6	12
Ventilation	3	16	6	12
Building construction	3	12	3	12
Ladders	6	16	3	12
Vehicle extrication	3	8	3	12
Victim search and rescue	3	8	3	12
Ropes	3	16	3	8
Loss control	3	8	3	8
Water supply	3	8	3	8
Firefighter rescue	6	6	3	6*
Firefighter survival	6	6	3	6*
Flashover and recognition	3	8	3	6*
CPR	3	3	3	4
Fire protection systems	3	8	3	4
First aid	3	3	3	4
Hazardous material awareness	8	8	3	4
Portable extinguishers	3	8	3	4
Aircraft firefighting	3	8	2	4
Fire investigation	3	4	2	4
Foam fire streams	3	8	2	4
Communications	3	8	1	4
Fire prevention and public fire education	3	8	1	4
Safety	3	8	1	4
Wildland firefighting awareness	3	3	3	3
Administration and organization	2	4	1	3
Emergency and disaster planning	2	8	NR	NR
Electives	6	79	NR	NR
Total hours	150	400	115	300

Notes: Commission = Kentucky Fire Commission. On January 1, 2014, the Kentucky Fire Commission issued a directive allowing firefighters with previous International Fire Services Accreditation Congress to receive 80 hours of equivalency toward their 150-hour or 400-hour Kentucky firefighter certification.

NR= not required. The commission voted to remove elective hours and the required training hours in “Emergency and Disaster Planning” because NFPA does not require them.⁴⁷

* The commission requires classroom instruction in both knowledge and skills for these subjects.

Source: Kentucky. Fire Commission. “Certification Levels.” 2023. Web.

For program eligibility, the commission considers a firefighter compliant with minimum training standards once they complete all requisite training hours in each subject and within the prescribed time.

The commission considers a volunteer or paid firefighter compliant with its minimum training standards, for the purposes of eligibility for commission programs, once they have completed the requisite instructional hours in each training module—150/115 hours of prescribed curriculum completed within two years of joining a volunteer department, and 400/300 hours of training within one year of their start date for paid firefighters.

Commission training compliance also requires firefighters to complete annual in-service training—20 hours for volunteers and 100 hours for paid firefighters.

The commission also requires volunteer and paid firefighters to complete annual in-service training to maintain compliance with minimum training standards—20 hours for volunteers and 100 hours for paid firefighters. These ongoing training requirements ensure firefighters remain proficient in their skills and stay updated on evolving safety protocols. The completion of in-service training must also be officially documented in KyFIRES.

Evaluating NFPA Compliance

Evaluating the alignment of commission's training standards with NFPA requirement is important to ensure firefighter safety, effective emergency response, and the maintenance of IFSAC accreditation, which validates the rigor and national recognition of Kentucky's firefighter certifications. Based on a comparison of testing processes and NFPA standards, Kentucky is compliant with generally accepted national standards.

Evaluating whether the commission's minimum training standards align with NFPA is important for several reasons. First, if the state's standards fall short of nationally recognized best practices, Kentucky firefighters could be exposed to unnecessary risks on the job and potentially compromise their ability to protect lives and property. As the commission holds accreditation through IFSAC, a failure to maintain NFPA compliance could lead to the loss of this credential. IFSAC accreditation signifies a commitment to rigorous and standardized training, and its absence could raise concerns about the portability and recognition of Kentucky firefighter certifications across state lines. Based on a comparison of testing processes and NFPA standards, Kentucky is compliant with generally accepted national standards.

This analysis centered on skills evaluated in the commission's hands-on certification tests, in which a firefighter's competent performance implies understanding the related knowledge.

This analysis focused on the demonstrable skills evaluated through the commission's hands-on skills assessment for IFSAC-accredited Firefighter I and Firefighter II certification testing. The successful demonstration of a required skill inherently implies the acquisition and retention of the associated knowledge. If a firefighter can competently perform a skill under examination, they possess the necessary understanding of the procedures, safety protocols, and operational principles underpinning that action.

The commission uses a station-based system with 10 stations for Firefighter I and 6 for Firefighter II to assess these skills.

The commission employs a station-based system to test the competency at performing required skills. Candidates rotate through various stations, each designed to evaluate specific job-related skills. The Firefighter I certification test includes 10 stations, while the Firefighter II certification test has 6 stations. At each station, a certified exam proctor randomly selects one skill from a set of potential skills established by the commission and requires the candidate to properly perform the chosen skill. For example, a candidate at Station A for Firefighter I certification will be asked to

- don and doff PPE;
- don SCBA over-the-head method;
- don SCBA coat method;
- don SCBA seated method;
- doff SCBA and PPE; or
- replace SCBA cylinder.⁴⁸

To ensure consistent evaluation, the commission uses standardized skill-test sheets for each skill at each station; these sheets also indicate the corresponding NFPA job performance requirements being evaluated. LOIC staff utilized these sheets, compiling the JPRs for each station and comparing them to all NFPA 1001 requirements for Firefighter I and II, to assess the alignment of the commission's minimum training standards to NFPA standards.

To ensure consistency in how candidates are evaluated, the commission has developed a standardized skill-test sheet for each skill that a candidate could be asked to perform at each station. In the Station A example, the commission has prepared six individual skill-test sheets corresponding to the six possible skills a candidate may be asked to perform.

If the candidate is asked to don and doff PPE at Station A, the exam proctors will use the corresponding skill sheet for evaluation. This particular skill-test sheet lists the following procedures that must be performed with 100 percent proficiency to pass: don pants, suspenders, and boots; don hood; don coat with closure and collar up; don helmet with eye protection on and chin strap in place and fastened; don structural gloves; don PPE within 1 minute, 30 seconds; remove PPE; inspect PPE for damage; clean and dry equipment as needed; remove damaged equipment from service and report damage to company officer; and place PPE in ready state.⁴⁹

Each skill-test sheet also indicates which NFPA JPRs are being evaluated with each prescribed tasks candidates could be expected to demonstrate at each station. Collectively, the skill-test sheets for Station A indicate that Station A is designed to test a candidate's competency in NFPA JPR 4.1.2 and 4.3.1 through 4.3.3.

LOIC staff used these skill-test sheets to determine whether the commission's minimum training standards align with NFPA requirements. JPRs listed on skill-test sheets were compiled for

each station, as illustrated above, and were then compared with all the JPRs NFPA 1001 requires for Firefighter I and Firefighter II.

Staff compared the NFPA JPRs required for Firefighter I and Firefighter II with the station(s) at which the commission tests these JPRs during certification skills testing. The analysis found that the commission is compliant with NFPA standards.

Tables 3.2 and Table 3.3 review whether all NFPA standards for Firefighter I and Firefighter II are tested for certification. These tables show the job performance requirements NFPA 1001 requires of Firefighter I and Firefighter II, respectively, compared with which testing station each skill is potentially tested during commission-administered testing. Staff's analysis found each JPR is a possible test in at least one station, confirming the commission's IFSAC certification process compliant with NFPA standards.

Table 3.2
Comparison Of Skills Tested By The Commission
For IFSAC-Accredited Firefighter I Certification
To NFPA's Job Performance Requirements

Performance Requirement	Commission Testing Station									Compliant
	A	B	C	D	E	F	G	H	I	
4.1.2: Don/doff personal protective equipment	X			X						✓
4.2.1: Communicate emergencies					X					✓
4.2.2: Receive calls					X					✓
4.2.3: Operate radios					X					✓
4.2.4: Emergency calls for assistance		X								✓
4.3.1: Use self-contained breathing apparatus	X	X								✓
4.3.2: Respond on apparatus	X				X					✓
4.3.3: Establish/operate in work areas at scenes	X				X					✓
4.3.4: Force entry into structure							X			✓
4.3.5: Exit hazardous area as a team		X								✓
4.3.6: Use ladders			X							✓
4.3.7: Attack a passenger vehicle fire						X				✓
4.3.8: Extinguish fires in exterior Class A materials				X		X				✓
4.3.9: Search and rescue in a structure		X	X							✓
4.3.10: Attack an interior structure fire			X	X		X				✓
4.3.11: Perform horizontal structure ventilation			X				X	X		✓
4.3.12: Perform vertical structure ventilation			X					X		✓
4.3.13: Overhaul a fire scene				X						✓
4.3.14: Conserve property from further damage				X			X			✓
4.3.15: Connect pumper to a water supply							X			✓
4.3.16: Extinguish Class A, Class B, Class C fires						X				✓
4.3.17: Operate emergency scene lighting					X					✓
4.3.18: Turn off building utilities					X					✓
4.3.19: Combat a ground cover fire						X				✓
4.3.20: Tie a knot appropriate for hoisting tools				X						✓
4.3.21: Operate an air monitoring instrument								X		✓
4.5.1: Clean and check equipment and tools								X	X	✓
4.5.2: Clean, inspect, return fire hose									X	✓

Note: Commission = Kentucky Fire Commission; IFSAC = International Fire Services Accreditation Congress; NFPA = National Fire Protection Association. The "Performance Requirement" column contains a number and description. The number corresponds to National Fire Protection Association standards from NFPA 1001. The text is a summary of the description that accompanies each standard in NFPA 1001. Source: Staff comparison and analysis of skills tested by the commission for Firefighter I certification and NFPA 1001 required job performance requirements.

Table 3.3
Comparison Of Skills Tested By The Commission
For IFSAC-Accredited Firefighter II Certification
To NFPA's Job Performance Requirements

Performance Requirement	Commission Testing Station						Compliant
	A	B	C	D	E	F	
5.1.2: Understand incident management systems	X						✓
5.2.1: Complete basic incident reports	X						✓
5.2.2: Communicate the need for team assistance	X						✓
5.3.1: Extinguish an ignitable liquid fire						X	✓
5.3.2: Coordinate an interior attack line in a structure fire	X						✓
5.3.3: Control a flammable gas cylinder fire						X	✓
5.3.4: Protect evidence of cause and origin	X						✓
5.4.1: Extricate a victim in a motor vehicle			X	X			✓
5.4.2: Assist rescue operation teams			X				✓
5.5.1: Perform fire safety survey in a structure		X					✓
5.5.2: Present fire safety information to visitors or groups		X					✓
5.5.3: Prepare a preincident survey		X					✓
5.5.4: Maintain power plants, power tools, and lighting equipment					X		✓
5.5.5: Perform annual service test on hose					X		✓

Note: Commission = Kentucky Fire Commission; IFSAC = International Fire Services Accreditation Congress; NFPA = National Fire Protection Association. The "Performance Requirement" column contains a number and description. The number corresponds to National Fire Protection Association standards from NFPA 1001. The text is a summary of the description that accompanies each standard in NFPA 1001.

Source: Staff comparison and analysis of skills tested by the Kentucky Fire Commission for Firefighter II certification and NFPA 1001 required job performance requirements.

In summary, LOIC staff's analysis found that the commission's minimum training standards are its expert recommendation for the training needed to successfully pass the knowledge and skills tests for IFSAC Firefighter I or II certification. Still, the commission cannot mandate IFSAC certification for all local firefighters; as a result, its minimum training standards and required instructional hours do not guarantee the comprehensive knowledge and skills testing necessary to fully ensure NFPA compliance.

IFSAC Oversight Insurance For Continued Compliance

Accreditation provides external validation by ensuring its adherence to NFPA standards. Reaccreditation requires a comprehensive reapplication and on-site review every five years, demonstrating ongoing operational capacity and adherence to best practices.

The commission's IFSAC accreditation adds a layer of external oversight. First, to become a member, the commission had to demonstrate comprehensive adherence to NFPA standards, including evidence of a robust evaluation methodology for both knowledge and practical skills testing, and evidence of strict implementation of its certification policies and procedures. Furthermore, IFSAC requires reaccreditation every five years.⁵⁰

Reaccreditation

The IFSAC reaccreditation involves submitting an application and an on-site visit. The application requires the commission to submit documentation showing sufficient funding and staffing for the continuous operation of certifying firefighters, test correlation sheets, methodologies used to evaluate knowledge and skills, and certification policies and procedures. IFSAC scrutinizes these documents prior to the in-person site visit.⁵¹

On-Site Visit

During the IFSAC site visit, a team of trained peers thoroughly assesses the commission's operations through facility inspections, policy reviews, and evaluations of testing materials and documentation. This rigorous process ensures consistent compliance with IFSAC requirements and continued NFPA compliance.

The site visit is conducted by a team of peers who have been trained on the certification processes. This IFSAC team examines records and makes direct observations to ensure that the commission is consistent and compliant with IFSAC requirements, including facilities inspection, review of policies and procedures, evaluation of test banks and evaluation materials, and review of completed certification documentation, additional supporting records, and use of checklists and worksheets.

Facilities Inspection. The site visit team conducts a physical inspection of the commission's facilities. This assessment ensures that the physical environment, resources, and equipment meet prescribed standards necessary to support certification programs effectively.⁵²

Review Of Policies And Procedures. The team examines the commission's policies and procedures related to the administration and management of certification programs. These include policies governing certification processes, examination administration, record-keeping, and compliance with IFSAC accreditation requirements.⁵³

Evaluation Of Test Banks And Examination Materials. Test banks, consisting of written examination questions and practical skill evaluation sheets, are reviewed. The site visit team reviews the completeness, validity, and security of these materials to ensure they meet IFSAC's rigorous testing standards. This review involves verifying that examinations accurately assess candidate competencies as required.⁵⁴

Review Of Completed Certification Documentation. Completed examination records, skill performance sheets, and correlation sheets are inspected. These documents provide evidence that certification testing results are properly recorded, maintained, and

correlated with established standards to validate candidate competency.⁵⁵

Additional Supporting Records. During the course of the visit, the site visit team may request additional documents or records necessary to clarify findings or resolve issues encountered in the review process. These could include training records, previous audit results, or evidence of corrective actions taken to address prior deficiencies.⁵⁶

Use Of Checklists And Worksheets. The IFSAC site visit team employs standardized checklists and accreditation criteria worksheets during the visit. These tools guide the review process and help document objective, comprehensive analyses of the certifying commission's conformity to accreditation standards. The recorded findings based on these worksheets support the final accreditation decision.⁵⁷

This IFSAC accreditation provides a rigorous oversight mechanism and ultimately enhances the credibility and consistency of firefighter certifications within the Commonwealth.

Chapter 4

Review Of Fire Commission Administrative Costs

The Kentucky Fire Commission is primarily funded through general fund appropriations that are used for statewide fire rescue training and a dedicated insurance surcharge that is restricted by statute to specific programs like training incentives.

The Kentucky Fire Commission is funded from two primary sources: general fund appropriations and a dedicated surcharge on certain insurance premiums. There are no statutory spending restrictions on general fund appropriations, and the commission uses these dollars primarily to support State Fire Rescue Training, which provides training to firefighter and emergency responders across the state through 12 district offices. Statute, however, restricts the spending of surcharge dollars to programs specified in KRS 95A.200 to 95A.300 that include most of the commission's training incentive programs.⁵⁸ Additionally, statute places a 5 percent limit on the annual allotment of surcharge dollars used to reimburse the Kentucky Community and Technical College System for administrative costs of the commission and an additional 5 percent reimbursement limit for administrative costs of programs denoted in KRS 95A.262.⁵⁹

Staff's analysis confirmed the commission's compliance with a 5 percent administrative spending limit on the initial allotment to the commission, but could not verify compliance with another limit placed on dollars allocated to programs in KRS 95A.262, leading to one recommendation and one matter for legislative consideration.

Staff's analysis of the commission's finances from FY 2020 to FY 2024 confirmed the commission's compliance with the 5 percent limit on the annual surcharge allotment for KCTCS administrative expenses. However, staff could not determine compliance with the separate spending limit for programs under KRS 95A.262 due to the structure of KCTCS's accounting system. This chapter makes one recommendation to the commission and one matter for legislative consideration.

Commission Allocations

The commission receives general fund appropriations and proceeds from insurance premium surcharges. The surcharge dollars are deposited into the Firefighter Foundation Program fund, with a portion of non-domestic insurer revenue also supporting the Kentucky Law Enforcement Foundation Program Fund.

The commission receives general fund appropriations as a line item in KCTCS's biennial budget. This allocation is based on the commission's biennial budget request, which outlines its financial needs to support operations and programs for the upcoming two fiscal years.

Insurance premium surcharge dollars, \$1.80 per \$100 of insurance premiums, are generated by all insurers selling policies in Kentucky.⁶⁰ This excludes life and health insurance premiums. Insurers must report and remit these funds to the Department of Revenue on a monthly basis. Surcharge revenue collected from Kentucky-based insurance companies is deposited directly in the Firefighter Foundation Program fund, a dedicated state fund

established to offer financial incentives through programs outlined in KRS 95.A200 to KRS 95A.300. Surcharge dollars collected by non-domestic insurance companies are deposited into a State Treasury account specifically designated for the exclusive uses and purposes of the FFPF and the Kentucky Law Enforcement Foundation Program Fund (KLEPF).⁶¹ The total insurance surcharge revenue collected in FY 2024 from all insurers was approximately \$172 million.⁶²

On a quarterly basis, the Finance Cabinet uses cost-projections to determine the proportionate share of the surcharge dollars to allocate to each dedicated fund. From FY 2020 to FY 2024, the commission received an average allocation of \$49 million.

On a quarterly basis, the Finance Cabinet uses cost projections provided by the administrators of FFPF and KLEPF to determine the proportionate share of the joint insurance premium surcharge proceeds to allocate to each dedicated fund.⁶³

Table 4.1 presents the annual amount allocated to the commission from these two sources for FY 2020 to FY 2024. Over this period, the commission received an average of \$49,157,963 from the insurance premium surcharge and \$1,869,900 in general fund appropriations each year. While general fund allocations remained consistent, the amount deposited into FFPF increased annually.

Table 4.1
Kentucky Fire Commission Annual Allocations (In Millions)
FY 2020 To FY 2024

Allocations	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Insurance premium surcharge	\$43.9	\$44.8	\$47.5	\$51.9	\$57.7
General fund	1.9	1.8	1.9	1.9	1.9
Total	\$45.8	\$46.7	\$49.4	\$53.7	\$59.6

Source: Brenda Goddard, director of finance, Kentucky Community and Technical College System. Secure file share (SharePoint), April 16, 2025.

Firefighter Foundation Program Fund Finances

Total annual revenue for the FFPF fluctuated between approximately \$85 million and \$95 million from FY 2020 to FY 2024, primarily driven by increasing surcharge allocations, while total annual expenditures ranged from approximately \$44 million to \$55 million, resulting in annual surpluses between \$37 million and \$45 million.

Table 4.2 provides a more detailed overview of the dollars deposited into FFPF. Annual allotments of insurance surcharge dollars represent the largest revenue source, increasing annually from \$43.9 million in FY 2020 to \$57.7 million in FY 2024. The commission is also allocated funding in the state's biennial budget for capital projects related to the construction of the National Responder Preparedness Center (NRPC). These projects include the construction of the NRPC's parking lot, classrooms, training drill tower, fire pumpers, dormitory, property acquisition, and training equipment. Capital project allocations averaged \$3.6 million from FY 2020 to FY 2024. Interest income represents gains and losses on the investment of unallocated funds and averaged \$540,000 annually.⁶⁴ The commission loses spending

authority on FFPF allotments at the end of each year; any unspent funds accumulate and are carried over to the following year's budget, averaging \$39.8 million annually.^d Carryforward amounts fluctuate from year to year due to actual cash inflow and outflow, meaning revenues and expenses may not match in certain accounting periods. KCTCS uses accrual accounting to track revenue and expenditures, which may lead to variances in reporting money that rolls over year to year. Expenditures represent money spent on FFPF programs in accordance with KRS 95A.200 to 95A.300, averaging \$45.1 million annually.

Table 4.2
Firefighter Foundation Program Fund
Revenues And Expenditures (In Millions)
FY 2020 To FY 2024

Category	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Total annual revenue	\$87.8	\$86.3	\$85.3	\$93.3	\$94.9
Carried forward	42.8	41.5	38.8	40.8	35.2
Surcharge allocation	43.9	44.8	47.5	51.9	57.7
Investment income	1.1	<0.1	-1.0	0.6	2.0
Total annual expenditures	46.4	47.3	44.4	55.5	49.9
Expenditures	40.4	40.9	44.4	50.0	49.9
Capital projects	6.0	6.4	0.0	5.5	0.0
Annual surplus	\$41.4	\$39.0	\$40.9	\$37.8	\$45.0

Note: Interest income for FY 2021 is \$11,433.33.

Source: Brenda Goddard, director of finance, Kentucky Community and Technical College System. Secure file share (SharePoint), April 16, 2025.

Administrative Spending On FFPF Dollars

KRS 95A.240(3) limits the commission's use of initial FFPF allotments for KCTCS administrative expenses to 5 percent, with the remainder for specified programs. Additionally, KRS 95A.262(7) imposes a separate 5 percent administrative cap on FFPFs allocated to programs under that statute.

When the Finance Cabinet initially splits insurance surcharge receipts between FFPF and KLFPPF, KRS 95A.240(3) places a 5 percent spending limit on the amount the commission can use of this initial FFPF allotment for reimbursing KCTCS for administrative expenses.⁶⁵ The remainder can be used for purposes outlined in KRS 95A.200 to KRS 95A.300. However, KRS 95A.262(7) places another 5 percent administrative reimbursement cap on those FFPF dollars that the commission decides to allocate for programs outlined in KRS 95A.262.⁶⁶ This section analyzes whether the commission's spending adheres to both these limitations.

^d While the General Assembly has occasionally swept a portion of these rollover dollars, it did not do so during the study period.

The statutes lack a clear definition of "administrative expenses," leading the commission, administratively attached to KCTCS, to interpret this to include its own operational costs related to its core responsibilities within the KCTCS framework. This inclusive application arises from the absence of a precise statutory definition.

These two statutes do not provide a specific definition of "administrative expenses." Since the commission is administratively attached to KCTCS, the commission considers its operational costs, including personnel salaries and administrative expenditures directly related to its core responsibilities to fall under the purview of these reimbursement limitations. This interpretation stems from the understanding that these activities are conducted in furtherance of the commission's mandate as part of the broader KCTCS framework. The lack of a precise statutory definition for administrative expenses has led to this inclusive application of the reimbursement restrictions by the commission.

Matter For Legislative Consideration 4.A

Matter For Legislative Consideration 4.A

The General Assembly may wish to consider defining what is to be included in the administrative cost reimbursements to the Kentucky Community and Technical College System in KRS 95A.240(3) and KRS 95A.262(7).

Administrative Spending Limit on Initial FFPP Allocation

Staff analysis of the commission's administrative reimbursements to KCTCS found the commission consistently stayed within the 5 percent limit of the annual FFPP allocation from FY 2020 to FY 2024, demonstrating compliance with KRS 95A.240(3).

Table 4.3 shows the annual Finance Cabinet allocation to FFPP from FY 2020 to FY 2024 and the corresponding 5 percent spending limit placed on those funds by KRS 95A.240(3). A comparison of this 5 percent figure with the amount the commission actually spent on reimbursing KCTCS for incurred administrative expenses shows the commission is compliant. For example, in 2024, the total FFPP allotment was \$57.7 million, meaning the commission's spending limit was \$2.9 million, yet it spent only \$2.1 million on reimbursed administrative expenses. Over the study period, the commission consistently remained below this threshold by an average of \$499,553.

Table 4.3
Statutory Limits And Actual Administrative Expenditures
For All Funds Allocated To The Firefighter Foundation Program Fund Annually
FY 2020 To FY 2024

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Annual allocation	\$43,915,945	\$44,834,618	\$47,484,531	\$51,873,716	\$57,680,867
5 percent administration threshold	2,195,797	2,241,731	2,374,227	2,593,686	2,884,043
Administrative reimbursement	\$1,902,020	\$1,699,042	\$1,929,641	\$2,136,679	\$2,124,334
KRS 95A.240(3) compliant	Yes	Yes	Yes	Yes	Yes

Source: Brenda Goddard, director of finance, Kentucky Community and Technical College System. Secure file share (SharePoint), April 16, 2025.

Administrative costs show that salaries consistently constituted the largest portion each year, followed by operations and travel, with human resources and COVID-related expenses making up the smallest category. The total administrative expenses fluctuated annually, ranging from a low of \$1.7 million in 2021 to a high of \$2.1million in 2023.

Table 4.4 shows the administrative cost of all programs from FY 2020 to FY 2024. Expenses are categorized into salary, operations and travel, and human resources and COVID-19 relief, all of which are costs associated with the administration of FFPF programs. Salaries of the commission account for roughly 69 percent of total administrative cost, averaging \$1.4 million annually. Operations and travel expenses average \$500,000 a year and include maintenance, utilities, KyFIRES data management software, travel for auditors, phone services, and the Fallen Firefighter Memorial in Frankfort. Other administrative costs associated with human resources are spent on various employee training and software licenses. Funds allocated to combat COVID were only disbursed during fiscal years 2020 and 2021.⁶⁷

Table 4.4
Firefighter Foundation Program Fund Administrative Costs
For All Programs
FY 2020 To FY 2024

Administrative Expenses	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Salaries	\$1,253,446	\$1,041,590	\$1,308,835	\$1,481,039	\$1,732,398
Operations and Travel	530,789	527,031	471,987	614,850	356,322
Human Resources and COVID	117,785	130,250	148,819	40,789	35,614
Total	\$1,902,020	\$1,698,872	\$1,929,641	\$2,136,679	\$2,124,334

Source: Brenda Goddard, director of finance, Kentucky Community and Technical College System. Secure file share (SharePoint), April 16, 2025.

A closer look at FY 2024 administrative expenses for each program illustrates that the Incentive Pay and Pension program incurs the largest share at 48 percent, followed by State Aid at 19 percent. Although some programs exceeded their budgeted administrative costs, the total actual administrative expenses of \$2.1 million were under the overall budgeted amount of \$2.4 million.

For illustrative purposes, Table 4.5 shows a detailed breakdown of administrative expenses of the commission's programs for FY 2024 – the calculated 5 percent threshold is based on the annual allotment to FFPF shown in Table 4.3. The Incentive Pay and Pension program is the largest contributor in providing financial support to professional firefighters, and accounts for 48 percent of administrative costs. State Aid is the second largest program, designed to provide financial support to volunteer fire departments, accounting for 19 percent of administrative costs. While about a quarter of each program's actual administrative expenses exceeded their budget, the statutory restriction is on the overall administrative expenses for all programs. The 5 percent administrative cost threshold calculated for all FFPF programs was \$2.4 million, which the commission was under by expending \$2.1 million. Staff analysis of the 5 percent spending limit on reimbursing KCTCS for administrative expenses, as detailed in KRS 95A.240(3), finds the commission compliant.

Table 4.5
Summary Of Commission Administrative Spending By Program
FY 2024

Commission Programs	Program Budgeted	Program Expenditure
Incentive pay and pension	\$23,761,900	\$25,587,850
State aid *	9,200,000	7,916,500
Personal protective equipment *	2,810,000	2,757,560
Training initiatives	2,700,000	2,514,145
Worker's compensation *	2,397,100	2,397,133
Mobile facilities *	2,000,000	2,052,171
Firefighter PTSD	1,250,000	141,926
Fire training facility grant *	1,000,000	999,960
Expanded programs *	1,000,000	746,396
Health, safety, and wellness *	1,000,000	822,427
National responder preparedness center	700,000	742,400
Hepatitis A and B *	500,000	2,806
Technical innovations *	500,000	402,433
EMS training and equipment *	270,000	205,832
WMD, hazardous materials and response to terrorism *	250,000	245,909
Safety education fund	170,000	127,559
Driver/operator *	150,000	62,219
National Fire Academy training	40,000	26,964
Total	49,699,000	47,752,190
5 percent administrative cost threshold	2,484,950	-
Actual administrative costs	-	\$2,124,334

Note: Commission = Kentucky Fire Commission.

* Indicates a program that is required to be included in administrative costs by statute authority (KRS 95A.262(7)).

Source: Brenda Goddard, director of finance, Kentucky Community and Technical College System. Secure file share (SharePoint), April 16, 2025.

Administrative Spending Limit On KRS 95A.262 Programs

KCTCS manages all of the commission's financial operations and expenditures, processing payments and transactions via a monthly transfer.

The commission's financial operations, including all expenditures, are managed by KCTCS, which processes payments to all parties involved—employees, students, and suppliers—while managing related bank accounts and financial transactions. Each month, KCTCS initiates a transfer from the fire commission's Trust and Agency account to cover expenses submitted by the commission. Every expenditure made by the commission, which falls under 19 different budget categories, goes through this financial process centralized by KCTCS as one reimbursement or expense.

The spending limit on KRS 95A.262 programs is not auditable because KCTCS centrally processes all 19 budget categories as a single reimbursement, preventing the commission from separately tracking administrative expenses specifically for programs under KRS 95A.262.

With all financial transactions processed collectively through KCTCS systems, the commission cannot isolate administrative and commission expenses specifically linked only to the programs listed in KRS 95A.262. The reimbursement from the commission to KCTCS covers all these combined transactions, not just those tagged under the "Administrative and Commission Expenses" category. As such, the commission was unable to provide a distinct breakdown of administrative expenses for just those specific programs defined in KRS 95A.262, making this portion of staff's analysis not auditable.

Recommendation 4.1

Recommendation 4.1

The Kentucky Fire Commission should work with the Kentucky Community and Technical College System to remedy its inability to separate the administrative cost of the commission programs listed in KRS 95A.262 in order to demonstrate compliance with KRS 95A.262(7).

General Fund Appropriations

General fund appropriations are deposited into the State Fire Rescue Training account to cover operational expenses and firefighter training, without specific statutory restrictions beyond standard state financial regulations.

General fund appropriations are allocated to the commission through KCTCS as part of the state's biennial budget process. While these funds are not subject to specific line-item restrictions within the commission's budget, they remain subject to all applicable state financial regulations. KCTCS deposits these funds into the State Fire Rescue Training account, which is used to cover daily operational expenses for the commission's 12 district offices across Kentucky and to support the provision of 21 hours of training to each qualified fire department. There are no statutory restrictions placed on these general fund dollars.

The commission received an average of \$1.9 million annually from general fund allocations from FY 2020 to FY 2024. SFRT uses these funds to deliver training to firefighters throughout the state.

Table 4.6 summarizes the commission's allocations and expenditures from FY 2020 to FY 2024. During this period, the commission received an average of \$1.9 million in general fund dollars each year. In addition to state budget allocations, the commission allotted an average of \$4.9 million each year from SFRT carryforward and generated monies from previous years.

Table 4.6
State Fire Rescue Training Allocation And Expenditures
FY 2020 To FY 2024

Category	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Total budget	\$6,635,080	\$6,374,609	\$6,798,203	\$7,340,917	\$6,455,943
General fund appropriation	1,869,900	1,826,700	1,869,900	1,869,900	1,869,900
Carryforward and generated revenue	4,765,180	4,547,909	4,928,303	5,471,017	4,586,043
Expenditures	2,714,850	2,051,079	2,138,052	3,349,979	3,716,603
Surplus	\$3,920,230	\$4,323,530	\$4,660,151	\$3,990,938	\$2,739,340

Source: Katie George, staff attorney, Kentucky Community and Technical College System. Email to Jeremy Skinner. Aug. 12, 2024.

SFRT uses these funds to deliver training to all disciplines of emergency response, including fire departments, rescue squads, emergency medical services, local governments, businesses, and industries.

The commission's operational costs for its 12 district offices averaged \$1.5 million annually. Expenses included operations upkeep maintenance on facilities and equipment, and expenses incurred for administering training initiatives.

Table 4.7 details SFRT expenses from FY 2020 to FY 2024. Operation expenses average \$1.5 million each year, covering the commission's 12 district offices in multiple regions across Kentucky. District offices provide the mandatory 21 hours of training for each fire department, training to business and industry partners, as well as EMT/Paramedic certifications and degrees. Applicable training dependent on geographic location is also offered to stay current with local needs.

Maintenance involves the upkeep needs for all district buildings, ensuring training facilities and equipment are working effectively for successful training. Training initiative expenses include salaries for instructors, training for new instructors, and support to fire departments. Staying current with local needs and developing new instructors within their departments help the commission stay abreast and relevant with fire rescue standards and procedures.

Table 4.7
State Fire Rescue Training Expenditures
FY 2020 To FY 2024

Expenditures	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Operations for district offices	\$1,367,612	\$1,278,505	\$1,322,164	\$1,919,202	\$1,644,887
Maintenance	1,208,954	855,389	739,492	1,303,349	1,452,904
Training initiatives	138,284	-82,816	76,396	127,428	618,812
Total	\$2,714,850	\$2,051,079	\$2,138,052	\$3,349,979	\$3,716,603

Source: Katie George, staff attorney, Kentucky Community and Technical College System. Email to Jeremy Skinner. Aug. 12, 2024.

The commission also generates money from fees it charges for providing training and certifications. Revenue generated from various training programs fluctuated between approximately \$461,000 and \$811,000 from FY 2020 to FY 2024.

While there are expenses associated with training, there are ways the commission brings in revenue as well. Fees are collected when providing industry training classes and certifications, allowing the commission to use generated revenue for maintenance and training initiatives for SFRT. Money generated can be carried forward if not used, which allows the commission more flexibility and supplementary spending when providing necessary training. Table 4.8 shows revenues generated by SFRT from awarding certifications and degrees, industry training and fees, and selling retired vehicles and equipment.

Table 4.8
State Fire Rescue Training Revenue
FY 2020 To FY 2024

Revenue Collected	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Industry training	\$373,607	\$329,378	\$396,070	\$536,592	\$369,121
Training associated fees	52,746	148,067	138,276	108,879	98,203
Vehicle/equipment pool	203	131,389	47,325	155,689	88,228
EMT/Paramedic certification or degree	34,605	18,845	23,103	9,705	39,554
Total	\$461,161	\$627,679	\$604,773	\$810,866	\$595,105

Note: The totals for FY 2022, FY 2023, and FY 2024 do not equal the sum of the revenue due to rounding.
Source: Katie George, staff attorney, Kentucky Community and Technical College System. Email to Jeremy Skinner. Aug. 12, 2024.

Industry training, which includes SFRT instructors providing training and certifications to Kentucky and non-Kentucky industries and businesses, generated the largest revenue for SFRT, averaging \$400,000 annually. Money generated from fees charged to local fire department and firefighters for training and certification constitutes the next largest revenue source for SFRT, averaging \$134,000 annually. Additionally, SFRT generates revenue by selling outdated vehicles and fire equipment, averaging \$85,000 annually. This generated revenue allows the commission to supplement its general fund appropriations

Appendix

Kentucky Fire Commission Response

The executive director, director of training, director of finance, and legal counsel for the Kentucky Fire Commission delivered an in-person response at the June 12, 2025, meeting of the Legislative Oversight and Investigations Committee, but the chief financial officer of the Kentucky Community and Technical College System (KCTCS) was unable to attend the meeting and submitted the written response below on behalf of the KCTCS.



MEMO

TO: LEGISLATIVE RESEARCH COMMISSION
FROM: TODD J. KILBURN, KCTCS CHIEF FINANCIAL OFFICER
RE: KCTCS RESPONSE TO THE KENTUCKY FIRE COMMISSION MINIMUM TRAINING STANDARDS AND ADMINISTRATIVE SPENDING AUDIT
DATE: JUNE 12, 2025

I. INTRODUCTION

I regret that I am unable to attend today's committee meeting, as I am currently in Elizabethtown for a meeting of our Board of Regents. However, please accept this memorandum as the Kentucky Community & Technical College System's (KCTCS) formal response to the Legislative Research Commission's (LRC) audit of the Kentucky Fire Commission's Minimum Training Standards and Administrative Spending.

Specifically, KCTCS accepts Recommendation 3.1 and offers feedback regarding Matter for Legislative Consideration 4.A and Recommendation 4.1. This memo outlines our proposed path forward in addressing these recommendations.

II. RECOMMENDATION 3.1

KCTCS accepts Recommendation 3.1 and is actively working with the Fire Commission to promulgate administrative regulations that formally establish the reduced training hour requirements for both professional and volunteer firefighters. These requirements are based on the standards of the Fire Commission's new Basic I and Basic II certifications and will be implemented in accordance with Chapter 13A.

III. MATTER FOR LEGISLATIVE CONSIDERATION 4.A

KCTCS agrees with the recommendation outlined in Matter 4.A. We acknowledge that our historical interpretation of KRS 95A.240 and KRS 95A.262 did not align with the interpretation provided by the audit team. We appreciate their perspective and support the recommendation to clarify the statutory language. This clarification will help ensure internal compliance and enhance our ability to demonstrate such compliance.

IV. RECOMMENDATION 4.1

While we acknowledge the audit team's interpretation of KRS 95A.262(7), we note that it presents significant challenges in isolating expenses related to specific programs from overall administrative costs. For example, salaries and benefits are not easily segregated by program under our current accounting practices. To ensure consistency and efficiency, we apply the same standards throughout the entire KCTCS system.

Historically, KCTCS has interpreted the five percent (5%) administrative cap referenced in KRS 95A.240(3) as synonymous with the five percent (5%) referenced in KRS 95A.262(7). As such, we have not maintained separate accounting structures to differentiate between the two.

KRS 95A.220(3) states:

“There is established the ‘Firefighters Foundation Program fund’ consisting of appropriations from the general fund of the Commonwealth of Kentucky, and insurance premium surcharge proceeds and earnings on the investments of those proceeds which accrue to this fund pursuant to KRS 42.190 and 136.392. The fund may also receive any other funds, gifts or grants made available to the state for distribution to local governments and volunteer fire departments in accordance with the provisions of KRS 95A.200 to 95A.300 and KRS 95A.262.”

Because KRS 95A.220(3) states that the Firefighters Foundation Program fund includes appropriations from the General Fund as well as other sources such as gifts or grants, and due to the similar language used in KRS 95A.240 (“administering the fund”) and KRS 95A.262 (“administering the funds”), both referencing the Firefighters Foundation Program, we respectfully request that the Legislative Research Commission clarify that the five percent (5%) referenced in both statutes should be interpreted as synonymous. This clarification would allow KCTCS to continue using its current accounting structures while ensuring compliance and transparency for all stakeholders.

V. CONCLUSION

KCTCS remains committed to transparency, accountability, and continuous improvement. We fully accept Recommendation 3.1 and are taking the necessary steps to implement it. We also support the clarification proposed in Matter 4.A and respectfully request legislative guidance to align statutory language with practical accounting realities as discussed in Recommendation 4.1.

We appreciate the work of the LRC and the audit team and look forward to continued collaboration to ensure the effective and efficient administration of firefighter training and funding programs across the Commonwealth.

Endnotes

- ¹ KRS 95A.240(3); KRS 95A.262(7).
- ² KRS 95A.040.
- ³ Ibid.
- ⁴ KRS 95A.040(3).
- ⁵ KRS 67.083(3)(u).
- ⁶ KRS 95.010; KRS 95.440.
- ⁷ KRS 273.167; KRS 273.415.
- ⁸ KRS 75.010; KRS 75.040.
- ⁹ Carrie H. Wilburn, director of operations, Kentucky Fire Commission. Email to Chris Hall, April 14, 2025.
- ¹⁰ Kentucky. Fire Commission. “KFS-3 New Fire Department Application.” Dec. 2, 2020. Web.
- ¹¹ KRS 75.400.
- ¹² 739 KAR 2.100 (2).
- ¹³ Ibid.
- ¹⁴ Kentucky. Fire Commission: *Kentucky Fire Commission FY2020 Annual Report; Kentucky Fire Commission FY2021 Annual Report; Kentucky Fire Commission FY2022 Annual Report; Kentucky Fire Commission FY2023 Annual Report; Kentucky Fire Commission FY2024 Annual Report*. nd. Web.
- ¹⁵ Carrie H. Wilburn, director of operations, Kentucky Fire Commission. Email to Chris Hall, April 1, 2025.
- ¹⁶ Kentucky. Fire Commission. “State Fire Rescue Training.” nd. Web.
- ¹⁷ Kentucky. Fire Commission. “Welcome To The Fire Academy Of Kentucky.” nd. Web.
- ¹⁸ Carrie H. Wilburn, director of operation, Kentucky Fire Commission; Jan 10, 2025. Interview.
- ¹⁹ Carrie H. Wilburn, director of operations, Kentucky Fire Commission. Email to Chris Hall, April 1, 2005.
- ²⁰ KRS 95A.292.
- ²¹ KRS 95A.262(16)(h)
- ²² Carrie H. Wilburn, director of operations, Kentucky Fire Commission. Email to Chris Hall, April 1, 2025.
- ²³ KRS 95A.262(16)(c).
- ²⁴ KRS 95A.262(1).
- ²⁵ KRS 95A.262(16)(a).
- ²⁶ KRS 95A.220(5).
- ²⁷ KRS 95A.262(2)(e).
- ²⁸ Kentucky. General Assembly. *Acts Of The 2022 Regular Session*, ch. 199, p. 66; Kentucky. General Assembly. *Acts Of The 2024 Regular Session*, ch. 175, p. 76.
- ²⁹ KRS 95A.262(2)(e).
- ³⁰ KRS 95A.262(8).
- ³¹ KRS 95A.262(14).
- ³² KRS 95A.262(16)(f).
- ³³ KRS 95A.262(16)(d).
- ³⁴ Kentucky. General Assembly. *Acts Of The 2022 Regular Session*, ch. 199, p. 66; Kentucky. General Assembly. *Acts Of The 2024 Regular Session*, ch. 175, p. 76.
- ³⁵ 739 KAR 2:020.
- ³⁶ Kentucky. General Assembly. *Acts Of The 2024 Regular Session*, ch. 175, p. 76.
- ³⁷ National Fire Protection Association. *NFPA 1010: Standard On Professional Qualifications For Firefighters*. NFPA, 2024.
- ³⁸ Kentucky. Fire Commission. “IFSAC Firefighter I & II Certification Testing Changes.” Jan. 6, 2025. Web.
- ³⁹ Public Safety Group. “NFPA 1010: What Fire Instructors Need To Know.” Feb. 12, 2025. Web.
- ⁴⁰ National Fire Protection Association. “The Standards Development Process.” 2025. Web.
- ⁴¹ National Fire Protection Association. *NFPA 1001: Standards For Fire Fighter Professional Qualifications*. NFPA, 2019.
- ⁴² Ibid.
- ⁴³ Bruce Roberts, commissioner; Carrie H. Wilburn, director of operations; Marc Rudder, director of training; and Christy Rodgers, accredited certification coordinator, Kentucky Fire Commission. Feb. 7, 2025. Interview.
- ⁴⁴ Ibid.
- ⁴⁵ National Fire Protection Association. *NFPA 1001: Standards For Fire Fighter Professional Qualifications*. NFPA, 2019.

- ⁴⁶ Kentucky. Fire Commission. “Basic 1/Basic 2 Firefighter Certification Implementation.” Jan. 5, 2023. Web.
- ⁴⁷ Marc Rudder, director of State Fire Rescue Training; Carrie Wilburn, director of operations, Kentucky Fire Commission. Email to Chris Hall, May 5, 2025.
- ⁴⁸ Kentucky. Fire Commission. “Firefighter 1 – Station A (PPE).” April 2024. Web.
- ⁴⁹ Ibid.
- ⁵⁰ International Fire Service Accreditation Congress. “Accreditation Guides And Documents.” Jan. 14, 2025. Web.
- ⁵¹ International Fire Service Accreditation Congress. “Certification Assembly: Accreditation Policy And Procedure.” IFSAC, October 2024.
- ⁵² Ibid.
- ⁵³ Ibid.
- ⁵⁴ Ibid.
- ⁵⁵ Ibid.
- ⁵⁶ Ibid.
- ⁵⁷ Ibid.
- ⁵⁸ KRS 95A.220(4).
- ⁵⁹ KRS 95A.240(3); KRS 95A.262(7).
- ⁶⁰ KRS 136.392.
- ⁶¹ KRS 136.392(2); KRS 136.392(3); KRS 95A.220 to 95A.300; KRS 15.430 to 15.515.
- ⁶² Kentucky. Finance and Administration Cabinet, Office of the Controller. “Law Enforcement Foundation And Firefighters Foundation Funds Surtax Receipts Worksheet For The Period July 1, 2023 - Final Period 13, 2024.” nd. Web.
- ⁶³ KRS 136.392.
- ⁶⁴ 739 KAR 2:070.
- ⁶⁵ KRS 240.3.
- ⁶⁶ KRS 95A.262(7).
- ⁶⁷ Brenda Goddard, director of finance, Kentucky Community and Technical College System. Secure file share (SharePoint), April 16, 2025.

