Welcome to the Hawaii State Fire Council’s Systems Testing information page. Below you will find the State Fire Council’s responses to some of your comments and questions regarding the upcoming System Testing administrative rule:

**General**

Revise “supervisory signal-initialing devices” to “supervisory signal-initiating devices” to be consistent with the NFPA 72 definition of a fire alarm system.

**Licensing**

Who are these third party certifying departments?


What does the factory certification look like…is it for the specific system being maintained?

**Ans:** Factory certification is training specific to the type of system being serviced, i.e. SimplexGrinnell Fire Alarm System. Manufacturers may require factory specific training for their respective systems, but the SFC will not require factory training to fulfill its licensing requirements except for dry chemical systems used for commercial cooking equipment and private fire hydrants.

If a technician has factory training which includes a test to pass at the end to gain a certificate will this be sufficient enough to obtain a license? Or is NICET certification also required?

**Ans:** No, factory or a manufacturer’s training will not be used in lieu of a third party certification except for dry chemical systems for commercial cooking equipment and private fire hydrants. NICET or ICC certification will be required for all SFC licensing needs.

Will the code require licensing for our new employees and trainees of fire alarm?
Ans: No, an entry level technician (new employee) would be able to work on systems he/she is striving to get certified on. However, he/she shall be supervised by a licensed individual. This assist in the learning process and will allow a new employee to gain necessary experience. Only a licensed individual shall sign off on the work performed by a trainee.

In your email fees are listed as $100 per category and in the ad rule it says $300.

Ans: Sorry for the confusion. The cost will be $100.00 per category. The license/s will be good for a period of three years from the date of issuance.

Will there be another extra cost to our companies to get certified?

Ans: There will be additional costs associated with taking the test from ICC and NICET. Please call or email ICC and NICET for further information.

Suggest more clarity for the list for what is included and not included in the fees by referring to the subchapters where each license requirement is stated.

Ans: The fire protection technician will be licensed for only those categories he/she has been certified and paid fees for. These four categories are: Fire alarm systems, portable fire extinguishers, water-based extinguishing systems (includes Class I, II, III combined, automatic sprinkler systems, fire pumps, and private fire hydrants), and non-water-based extinguishing systems (includes commercial cooking equipment and spray booths). Please be aware, at least for commercial cooking equipment, there are multiple extinguishing agents that may be utilized. Therefore, the minimum certification would be obtained through ICC. Since the certification for this system is to current standards the applicant would need to have gone through a manufacturer’s training to get certified in dry chemical systems utilized in older kitchen hoods.

We propose that the requirements be clarified to specifically state that in regards to the NICET testing and or certification, the State of Hawaii would accept either (i) written proof that the written requirements for the related specific classification have been achieved or (ii) the actual certification from NICET in the specific classification...

Also as stated above the actual NICET level should be established by these requirements.

Ans: The NFPA standards and certifying agency requirements for licensing will be included in the subchapters of this administrative rule.

NICET provides either a certificate or a wallet card. ICC provides a pass letter or wallet card or wall certificate. The SFC licensing and renewal process will accept
copies of only ICC and NICET wall certificates, wallet cards, and letters of satisfactory completion of training/testing. Please refer to ICC and NICET.

Honolulu FPB has always administered the test for people on the outer islands this is very difficult and daunting task even though they allow the local FPB to proctor the test it can easily take over a month just to get the test, then wait to find out the results and in several cases it has taken over 3 months to receive the certificate. The added burdens of having the application notarized then mailing it in having to wait for the test to be mailed to FPB then mailing it back makes absolutely no sense.

**Ans:** We are aware of some of the obstacles in getting licensed and therefore, will not be requiring notarization. For our purposes, we will require electronic copies of your certificate of completion, certificate of training (if necessary) State of Hawaii driver’s license, and application form.

Chapter 12-44.1.9, Section (C) denotes a written examination by a third party such as ICC or NICET. It does not specify which NICET level (I-IV) or specific tests would be required. These specifics may be better stated in the individual chapters for each fire protection system.

**Ans:** Minimum requirement would be NICET (Level II) for fire alarm systems. We will address the requirements for each subject in that subchapter.

Certifications from specific fire protection system manufacturers will not be accepted in lieu of training from an approved third party vendor. However, alarm systems and non-water based fire extinguishing systems (e.g. halon, foam, etc.) will require a manufacturer’s certificate of training and a third party certificate of training.

**Ans:** The SFC has changed its stance on manufacturer’s training and will not be requiring a manufacturer’s certificate of training for any of the four categories listed in the application (fire alarm systems, fire extinguishers, water-based fire extinguishing systems and non-water-based fire extinguishing systems). There are two exceptions; licensees servicing dry chemical commercial cooking equipment and private fire hydrants. The licensee shall have in his/her possession a certificate of training in dry chemical system commercial cooking equipment for older commercial cooking equipment. The licensee shall possess a pipefitters certificate of training, be able to demonstrate employment with a board of water department, or provide a certificate in water-based extinguishing systems to service private fire hydrants.

My license to service extinguishers expires in 2017. Will I need to be recertified again under the new rules/provisions?

**Ans:** No, your current license will be valid until it expires in 2017. However, you will need to be certified by a third party such as ICC by your expiration date. If you
presently have ICC certification you only need to be recertified by them. Refer to the ICC website (http://www.iccsafe.org/) for recertification requirements.

Other than getting a year to get new tags and forms there is no mention of time allowed for compliance of the other items such as training for existing employees. For technicians who need to have multiple licenses they should have a few years to get certified so they can get one this year another next year and so on, this will break up the payments over several years, this would be a onetime grandfather clause for existing technicians. New employees in most cases would not be ready to take all tests in the same year again breaking up the amount they would have to pay per year.

Ans: For now, the fire protection professional will have at least one year from the date the ad rule is passed. In cases of hardship, we will review on a case-by-case basis.

We concur with the use of the NICET examination for determining an applicant’s knowledge in a specific area of expertise. However, we note with respect to the second requirement for verification of work history/experience that inspection companies have experienced issues with work history evaluations from NICET when a person has more than one certification or subfield.

Ans: We are deferring to NICET to determine level of competency for certification and recertification of training. The SFC will not be requiring it for its licensing process.

Does NICET require retaking the test to recertify after 3 years?

Ans: The SFC administrative rule mirrors the HFD licensing process by requiring renewal every three years. The ICC and NICET also require recertification every 3 years.

The NICET renewal process requires compiling 90 continuing professional development (CDP) points during the years prior to recertification in categories including additional education, committee or task force participation, course instructor, producing instructional materials, member of professional societies, upgrading certification, etc. (See quick reference chart http://www.nicet.org/)

The ICC has a similar process using continuing educational units (CEU) to fulfill requirements for its recertification program. See http://www.iccsafe.org/ for further information.

Does this mean when he renews his SFC license he submits renewal NICET or ICC certification?
To renew the SFC license, you need a current ICC or NICET certification, and pay a fee. There is no retesting by ICC and NICET that we are aware of at this time. However, you will have to retake the test if your certification lapses.

Previously licensed technicians have until their present SFC license expires to obtain licensing through this new process. For those licenses expiring within a year from the adoption of this rule, you will have an additional year to obtain all applicable licenses.

Licensees whose initial ICC or NICET certification is older than three years will need to demonstrate they have maintained their ICC and NICET certification over the years by presenting prior certifications. Otherwise, the licensee shall go through an initial recertification again with ICC or NICET as if it were delinquent.

12-44.1.9, Section (g) establishes additional requirements, we feel that this section is extremely vague and leaves too much open for inconsistent applications and interpretations.

Chapter 12-44.1.9, Section (g), allows the SFC and AHJ to require the licensed fire protection specialist demonstrate knowledge in validating competency should the need arise.

Fees

The fees for each subfield appear to be excessive. Possibly one solution might be an initial application fee that would include the license being established and then a reduced fee for renewals as all of the work has been done previously.

We agree and reevaluated the fee schedule. As such, there will be $100.00 per category for initial/new licenses and $50.00 per category for renewals for a period of three years.

It is not clear if the license fees are annual or per year for the three year term.

The license fee of $100.00 per category is good for a period of 3 years.

Fire Alarm Systems

For a simple (older) FAS, such as it has one pull station, one bell, will we still require 3rd party certification?

Yes.

What NICET level will we require for fire alarm systems (FAS)?
Ans: NICET - Level II, as required by most AHJ's.

We would like to caution that by requiring a manufacturer's certification the SFC may be forcing buildings with proprietary fire alarm systems to use only the installing vendor as there may be no competitive alternative.

Ans: ICC and NICET certification process provide the minimum level of knowledge to service most, if not all, fire alarm systems to the current fire code. This being the case, ICC and NICET (Level 2) certification would be the minimum required level of training to service fire alarm systems within the State of Hawaii. This would eliminate the need for vendor specific training for FAS. Please note some fire alarm manufacturers may require manufacturer certification to service their systems.

The cover letter and the application state that the (Fire Alarm System) technician will need a manufacturer's certificate of training in addition to the third party certification.

Ans: The SFC has since changed its stance on this and will not require a manufacturer's certificate for fire alarm systems.

Chapter 12-44.1-12. Specifically, as written, it appears system owners are not allowed to perform the weekly, monthly or semiannual inspections or tests.

Ans: A trained individual may be able to perform the daily, weekly, monthly quarterly and semiannual tests per NFPA 72. An annual test will need to be performed by a licensed individual.

Chapter 2-44.3-13, Section (c), Fire alarm systems failing an annual check shall leave the expired inspection tag or decal on the annunciator panel or if not present, the fire alarm system control panel until the system is repaired.

We would like to establish a definition or criteria of what ascertains a failed annual check. We would be happy to participate in a discussion to help determine this criteria.

Ans: The State Fire Council's stance is a failed annual check would be deemed if a fire alarm system failed any part of an annual check/service according to NFPA 72. As such, the expired tag or decal shall remain in place until the system can successfully pass an annual check. The AHJ shall be notified immediately when a system cannot pass an annual check.

Chapter 12-44.3-13, Section (d), The AHJ and the building owner shall be immediately notified when a fire alarm system becomes inoperable. Alternative notification and response plans shall be implemented as approved by the AHJ until the fire alarm
system is fully operational. We would like to establish a definition or criteria of what ascertains a fire alarm system is inoperable.

**Ans:** An inoperable system designation would be deemed if the fire alarm system cannot notify the occupants of the building of a fire condition. For an inoperable system, the AHJ shall be notified immediately, who shall work with the system testing agency and building owner to determine the extent of the operability and possible safe guards to put in place while the system is inoperable.

Chapter 12-44.3-13. The other system specific sections require a copy of the report be submitted to the AHJ. However, the alarm section is silent on this requirement. Also the “notification” means is not consistent in as much as some areas say hard copy some say electronic. We recommend that all of these sections in the respective subchapters should have similar requirements and verbiage.

**Ans:** The SFC will address the inconsistencies. The AHJ shall be notified immediately for unsatisfactory system tests. Documentation of satisfactory tests shall be maintained on the premises with the owner and provided to the AHJ upon request.

The requirement of having the reports to the customer and HFD is a little impractical.

**Ans:** The SFC agrees with you and will amend the ad rule to require a written report be submitted to the building owner within 14 days from the date of inspection for satisfactory systems. An unsatisfactory system will require an immediate notification with a follow-up written report by the testing agency to the AHJ.

**Water-Based Extinguishing Systems**

Who designed the new tests? Will there be testing for wet and dry type systems? In what publications will we find the answers to the questions?

**Ans:** ICC and NICET developed, and maintain their respective testing/certification programs. ICC provides testing on sprinkler systems (CF – Commercial Fire Sprinkler Inspection) while NICET provides testing on Class 1, 2, 3, and sprinkler systems (Inspection and Testing of Water-Based Systems). Both certifying agencies also provide the fire protection professional with recommended study materials/list based on the current national standards to study for the tests.

We recognize NICET and ICC certification. We know of no other, but would be open to review other third party certification agencies. NFPA and NFA (National Fire Academy) were suggested as other agencies but presently do not meet the requirements set forth by the SFC.
Does the dry/wet standpipe systems and fire pumps come under the fire sprinkler system?

**Ans:** The SFC combined the wet/dry standpipe and sprinkler systems with the water–based system category to cut down the cost to get licensed/re-licensed. In addition, NICET stated wet and dry standpipe systems are covered in their testing. Both NICET and ICC provide sprinkler certifications.

Flow testing to achieve its performance rating? Inspections & testing in accordance when building were permitted.

**Ans:** Yes. The fire professional will need to verify the fire code and standards applicable at the time of permitting to confirm the criteria for inspection, maintenance, and testing of fire protection systems. The form reporting water-based fire extinguishing systems testing will require the building permit date. The Honolulu Department of Planning and Permitting may be able to assist the fire protection professional.

For older buildings with fire protection systems, the exhibits of the proposed administrative rules provides referenced materials to help in determining the fire code at the time the building was permitted. ([Exhibit I - http://labor.hawaii.gov/sfc/files/2015/03/Exhibit-I-Reference-Dates-DRAFT.pdf](http://labor.hawaii.gov/sfc/files/2015/03/Exhibit-I-Reference-Dates-DRAFT.pdf))

**Commercial Kitchen Hoods**

Restaurant kitchen hood systems being classified as non-water-based systems sounds logical but it’s grouped with “Clean Agent” systems such as Halon, Inergin and Co2 type systems with absolutely no mention of wet or dry chemical type systems, the systems included utilize electrical control panels, electrical control heads or modules, electrical smoke and heat detectors, electrical remote pull stations and a local alarm, these systems have all of their devices supervised by their panel and most have a main system bank along with a reserve set of agent tanks, these type of systems are normally engineered systems whereas hood systems are all pre-engineered and operate mechanically they use fusible links and do not have their own local alarm. These systems are vastly different in nature operation and their maintenance needs.

**Ans.** The ICC certification will cover this in depth in regard to wet chemical systems. The licensee will only then be licensed to maintain systems trained to. The licensee shall provide a manufacturer’s certificate of training for dry chemical systems in order to inspect, test and service them.

Much of what is on kitchen system report will only increase the workload and materials used not make it better, finding information such as building owner, system install date,
tax map key, etc. Fire alarm testing, company testing the building’s fire alarm system should be verifying and testing the alarm system.

**Ans.** Initially some information may take time to compile, however keep in mind the AHJ requires this information to ensure businesses are current with their requirements.

A hard rigid UNSAT sign on the pull station in a restaurant sounds rather large and would probably be removed by owner/mgr.

**Ans.** Understand. However, the sign is for restaurant personnel and firefighting crews to inform them this system is inoperable and not to be relied upon. It would then be imperative for the restaurant and fire protection technician to expeditiously correct this.

The following will be added to the commercial kitchen hood inspection form:

When a hood and duct cleaning service is used, a certificate showing the name of the servicing company, the name of the person performing the work, and the date of inspection or cleaning shall be maintained on the premises per 2014 NFPA 96.

After cleaning or inspection is completed, the hood and duct cleaning company and the person performing the work at the location shall provide the owner of the system with a written report that also specifies areas that were inaccessible or not cleaned.

**Spray Booths**

Subchapter 10 is for spray booths, but may involve water/non-water, so by this designation whether water or non-water will only require one license. If the person does both will he need two licenses?

**Ans:** No, our understanding is the ICC certification for pre-engineered industrial fire fighting system technician will provide all of the testing to ensure the person is knowledgeable in servicing this type of system.

Many spray rooms/booths are protected with a dry chemical systems which are identical to restaurant hood type systems with the exception for the type of chemical used to categorize them as water based extinguishing systems is a huge mistake.

**Ans.** Spray booths may be protected by non-water-based extinguishing systems and water-based extinguishing systems. As such, spray booth systems and commercial cooking equipment have been re-categorized to the non-water-based fire extinguishing systems to reduce fees.
Non-Water-Based Extinguishing Systems

3rd party training above and beyond the training we get from the manufacturer? Who can train us better than the manufacture? Who is going to do it?

Ans. The SFC has changed its stance on manufacturer’s certified training, we will not require manufacturer’s training as NICET provides all the necessary testing to be certified in inspecting, maintaining and servicing non-water-based fire extinguishing systems.

Fire Hydrants

Fire protection technicians wanting to get licensed to service, and maintain private fire hydrants shall submit a certificate of training. An example would be pipefitters school, present or past employment with a board of water, water-based fire extinguishing system certificate of training from ICC or NICET or other SFC approved training.