



NVFC Position Statement on the Ease of Federal Compliance

Volunteer fire departments make up 65% of the nation's fire and emergency medical services. From 2010 to 2020, the number of fire department calls increased by 23% to more than 36.4 million, while the number of volunteer firefighters decreased by 12%. During this time period the calls firefighters respond to have gotten more challenging. We've experienced increasing numbers of natural disasters like hurricanes, tornadoes, and wildfires; responded to the front lines of a global pandemic; fought the continued scourge of structural fires, including home fires; and addressed an increasing number of calls involving hazardous materials like lithium-ion batteries.

Volunteer responders accomplish all this and donate \$46.7 billion in annual services to the U.S. taxpayer while juggling full-time careers and families. Often volunteers serve in small communities where resources are stretched and they are required to fulfill multiple roles within their departments.

The National Volunteer Fire Council (NVFC), as the national organization representing the volunteer fire, EMS, and rescue services, appreciates the assistance the federal government provides to enhance the ability of volunteer responders to protect our communities. We also appreciate the federal government's need to ensure that the resources they provide go to proper custodians and those in most need.

However, some of the criteria that volunteer fire departments must fulfill to apply for these resources can be cumbersome and require tens and even hundreds of hours to complete. This can often be impossible for these departments to do since their personnel and resources are stretched so thinly. Many NVFC directors have heard from departments in their states that despite being in need of federal assistance, they have given up on applying for it because the process to attain it is too complicated.

Three specific obstacles that have been brought to the NVFC's attention as particularly cumbersome are the complexity of applications for Assistance to Firefighters Grant (AFG) and Staffing for Adequate Fire and Emergency Response (SAFER) grants, SAM.gov and the Department of Homeland Security (DHS) Civil Rights Evaluation Tool (CRET). The unique challenges volunteers face make it particularly difficult for them to track and list all the data requested in AFG and SAFER applications. NVFC AFG and SAFER peer reviewers have indicated that some of this data is often not needed to make a determination of grant need.

The NVFC has heard from many of our members that SAM.gov is very temperamental and if there is the slightest discrepancy in any data like address, Federal Employer ID Numbers, etc. the whole process can be halted. This often throws a grant applicant into a suspended status until the situation is resolved, and we understand that this can take months to years of trying to reach out to the General Services Administration (GSA).

Regarding the CRET, the NVFC has heard from our members that their submissions are often denied with little explanation. It would be easier for volunteer fire departments to comply with the CRET if they are provided with more guidance and easier access to sample language that would assist them in properly filling out their applications.

Therefore, the NVFC's Executive Committee:

- Recommends that the GSA reorganize SAM.gov to make it more user friendly and urges GSA to come up with a more streamlined process of resolving conflicts that may arise within the system.
- Recommends that DHS provide more assistance including more accessible sample language and templates to facilitate compliance with certain grant criteria like CRET.
- Requests that the federal government recognize the unique circumstances volunteer fire departments face and provide timely assistance and resolutions to issues encountered while a department works to comply with grant criteria.
- Requests that DHS work with the NVFC and other stakeholders on potential ways to simplify and shorten the AFG and SAFER applications.