

Fire Cause Classifications Removed from NFPA 921, 2021 Edition (Part II)

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8. Introduction to Part II'

This is the second Part of an article that explores the important decision to remove Chapter 20, "Classification of Fire Cause" from the upcoming 2021 edition of NFPA 921. To better appreciate the material that follows, you are encouraged to first read Part I. We began by summarizing the steps in the NFPA Standards Development Process that NFPA 921 has completed for this revision cycle. The 2021 edition will be issued in late 2020. Part I lists the type of information that is available concerning the content of the 2021 edition. This information is available for free access in the NFPA 921 Document Information Page, Next Edition tab.²

Part I also describes the four-category system for classifying fire causes (accidental, natural, incendiary, or undetermined),³ as well as some problems with this system. It explains the important distinction between incident reporting (which involves fire cause classification) and investigation reports (which result from applying the scientific method to determine fire cause). This distinction is reflected in a 2017 edition revision to NFPA 921's "scope."⁴ The earlier change in NFPA 921's scope became a significant factor in the ultimate decision to remove Chapter 20 from NFPA 921 in the 2021 edition.

Part II of this article provides further background leading up to the decision by the Technical Committee responsible for NFPA 921 (NFPA 921 TC) to remove fire cause classifications from NFPA 921. Part II begins with the position of the Organization of Scientific Area Committees for Forensic Science (OSAC) on this issue. The actions of the NFPA 921 TC in revising Chapter 20 in the First Draft of the 2021 edition are then summarized, together with the TC's reasons.

Next, the article looks at steps leading up to the NFPA 921 TC's action in deleting Chapter 20 in the Second Draft, and includes comments by those voting negative on the ballot for this action. Finally, we cite revisions in other chapters in the 2021 edition related to the deletion of Chapter 20, and suggest some implications of this change.

9. OSAC's Public Input

In considering the value of Chapter 20 to NFPA 921, of particular interest was the Public Input submitted on behalf of OSAC.⁵ It is noteworthy that this is the first revision cycle of NFPA 921 that OSAC has provided input. To evaluate any input, it is appropriate for the NFPA 921 TC to consider the identity of the submitter and the entity that he or she represents. We have introduced OSAC in previous articles. Below we reiterate some

salient points relevant to OSAC's stake in the development of NFPA 921.

The OSAC Subcommittee on Fire and Explosion Investigations focuses on standards and guidelines related to the investigation, analyses and interpretation of crime scenes where arson or use of explosives is suspected.

One of the Subcommittee's early priorities was to identify standards and guidelines that should be included in the OSAC Registry. The Registry "serves as a trusted repository of high-quality, technically sound standards and guidelines for the practice of forensic science."⁶ As a result of the Subcommittee's recommendations, NFPA 921 and NFPA 1033 were among the first to be approved by OSAC and added to the OSAC Registry.

Another of the Subcommittee's activities is preparing proposals for future editions of NFPA 921 and NFPA 1033. The OSAC subcommittee submitted four Public Inputs for 2021 edition of NFPA 921, and Public Input 282 is one of these four. It calls for the TC to delete Chapter 20 in its entirety.

In considering removing the classification system in Chapter 20, the substantiation of Greg Gorbett Ph.D. on behalf of OSAC in support of this Public Input is instructive:

The Classification of Fire Cause chapter attempts to assist the fire investigator with regard to the assignment of responsibility and with regard to reporting/compilation of statistics. These are quite disparate activities that are not well served by a single system. Further, modern reporting and compilation of fire statistics does not use a simple four category classification system as is advocated by NFPA 921. For instance, the NFIRS system uses a 16 category cause classification system. The four class system simply provides inadequate discrimination of causes to be useful to the fire prevention community. Given the inadequacy of the 921 categories and the inconsistency of 921 with modern fire reporting and classification systems, there is no point in providing the simplified method reported in chapter 20. Further, 921 has divorced itself from NFIRS explicitly. It would be contradictory and confusing to address NFIRS in Chapter 20 after having divorced 921 from NFIRS. In this regard it is wise to put cause classification for statistics outside the scope of 921.

With regard to the assignment of responsibility for the starting of a fire, the salient question is that of intent. Chapter 20 as currently configured provides

no guidance to the fire investigator toward the determination of intent. The incendiary chapter of 921 includes extensive discussions of indicators as well as motives and motive classifications, but provides no information or methodology for the determination of intent. Since nowhere in NFPA 921 is there methodology or guidance on the determination of intent, investigators are left to their own devices in the determination of intent. The incendiary fire cause classification is simply a means to memorialize their subjective opinions in a manner that creates credibility that is not inherently deserved. This does not serve the community.⁷

As the above substantiation for OSAC's Public Input underscores, the four-category classification system in NFPA 921 is inadequate.

10. NFPA 921 Technical Committee Action: The First Revision and Public Comments

The NFPA 921 TC initially acted with a First Revision of Chapter 20. Below are highlights of the matters addressed in the revised chapter:

- √ The revised chapter made a clear distinction between fire cause determination and classification, noting that cause determination requires an application of the scientific method. By contrast, the classifications described in Chapter 20 are used by governmental agencies for incident reporting⁸ and "may not be sufficient to describe the cause adequately."⁹
- √ Reinforcing the above distinction, the revised chapter aimed at classifying the "fire incident" (rather than the "fire cause," as it does in the 2017 edition). However, the title of the revised chapter remained "Classification of Fire Cause." The revised chapter limited the purposes of the classification system to incident reporting and compiling statistics. This diverged from the 2017 ed. text that described classifying the "cause of the fire," which could be used for assignment of responsibility (the subject of Chapter 21).
- √ A new section described the nature of a classification system and listed five national classification systems by way of example.¹⁰
- √ Consistent with the NFPA 921 2017 ed. revision of section 1 "Scope,"¹¹ the revised chapter distinguished between an incident report and an investigation report. It noted that classifying a fire incident in an incident report may be outside a fire investigator's duties and NFPA 921 does not require investigators to classify a fire for the purposes of conducting an investigation.¹²
- √ The classification names were changed as follows:¹³
 - o Accidental Fire Cause-Classification Incident,
 - o Natural Fire Cause-Classification Incident,
 - o Incendiary Fire Cause-Classification Incident; and,
 - o Undetermined Unclassified Fire Cause Incident.
- √ The new category of "unclassified" (replacing Undetermined Fire Cause) was also added to deal with situations where an incident is still under investigation or where there is insufficient data to classify the incident.¹⁴
- √ The chapter also permitted a classification of accidental where the exact nature of the incident could not be determined, but "all remaining working hypotheses would fall into the "accidental" classification."¹⁵

The TC Statement that accompanied the First Revision explains the reasoning of the TC in making the proposed changes:

Chapter 20 is revised to be consistent with the 2017 ed. revision to Chapter 1 by distinguishing the responsibilities of fire investigators as stated in s. 1.1 from classifying fire incidents and completing incident reports as described in 1.2. Since classifying fires for incident reporting is not the same as fire cause determination as addressed throughout this guide or assigning responsibility as addressed in chapter 21, we adjusted the classifications to indicate that it is the fire incident that is being classified (which may include fire cause), rather than conflating the process of classification with cause determination, which is a problem with Chapter 20 in the 2017 edition.

With respect to classifying an accidental fire incident as such in the absence of a known ignition source, the wording in the 2017 edition allows for an incendiary classification based on single factors but does not address similar accidental events. The revision allows an accidental classification when the specific ignition source cannot be identified but other factors indicate that the ignition source is not an intentional / incendiary act.

The TC has decided to leave the word "wind" in the definition of natural fire incident classification because wind is a well-known factor in the ignition scenario of some wildfires.

The classification of incendiary fire incident is revised to be consistent with the definition of incendiary fire.

A new category of "unclassified" is added to allow for situations where the fire incident is still under investigation or where there is insufficient data to make a classification.

As required by the NFPA's Standards Development Process, the TC was balloted on the First Revisions. 31 of 32 TC members voted in favor of this revision. NFPA 921 TC Chair Charles (Randy) Watson voted against it, providing the following comment to explain his negative vote:

The name of the chapter remains Fire Cause Classification. All of the classifications are related to the fire causes. Stating we are classifying the fire would communicate the type of fire it is. That is not what the discussion infers. Either the chapter should be eliminated, or the existing text should remain.

As at least two thirds of TC members were in favor of the First Revision, it passed the ballot and was published in the First Draft Report, initiating the opportunity for interested persons to file Public Comments.

Public Comments were received following the publication of the First Draft Report causing the TC to revisit its action on Chapter 20. Craig Beyler, Ph.D. submitted a Public Comment on behalf of OSAC renewing its position that Chapter 20 be deleted.¹⁶ A key point made in his substantiation was that preparing incident reports like NFIRS are outside of the scope of NFPA 921, as provided by subsections 1.1.1 and 1.1.2 in the 2017 edition. By contrast, Chapter 20 is dedicated to preparing incident reports — inconsistent with the scope statement in these subsections. Further, the four-category classification system in NFPA 921 is generally inconsistent with the classification systems used by the five organizations listed in the revised Chapter 20.¹⁷

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Other Public Comments also identified problems in assigning classifications using the revised text in Chapter 20 of the First Draft and offered wording intended to clarify how an incident should be classified if the ignition source is not identified.¹⁸

11. NFPA 921 Technical Committee's Further Action: The Second Revision

Upon further consideration, the TC decided to delete Chapter 20. It added a new section 19.8 to Chapter 19 "Fire Cause Determination" that generally describes the nature of incident classification and provides a non-exclusive list of six national classification systems for incident reporting. Below is the TC's Statement substantiating this action:

The scope of NFPA 921 specifically states that the completion of reports for the United States National Fire Incident Reporting System (NFIRS) are outside the scope of this guide. However, the classification of incidents is a topic that is addressed by various entities for various reasons. As such, there is a need to provide guidance on where incident classification information can be found and to clarify that incident classification is not the same as cause determination. The technical committee has fielded debates over Chapter 20 text over the past editions and has determined that the Chapter creates more issues than benefits. Since incident classification is addressed in other standards and is dependent on jurisdiction/organization use, providing specific definitions for incident classifications in NFPA 921 is not necessary.¹⁹

The TC also revised other sections of NFPA 921 that referred to fire cause classification to coordinate the deletion of Chapter 20. Cross-references to Chapter 20 were removed, mentions of classifying fire cause were removed,²⁰ and all chapters following the deleted Chapter 20 were renumbered. Below are a few examples of revisions resulting from the deletion of Chapter 20. (Revisions are emphasized in bold font.)

s. 19.6.5 (in Chapter 19 Fire Cause Determination) ... Negative corpus has **typically** been used in classifying fires as incendiary, **although the process has also been used to characterize fires classified as accidental.** ...²¹

19.6.5.1 Cause Undetermined. In circumstances where all hypotheses have been rejected, or if two or more hypotheses cannot be rejected, the only choice for the investigator is to conclude that the fire cause, or specific causal factors, is undetermined. It is improper to base hypotheses on the absence of any supportive evidence. That is, it is improper to opine a specific fire cause, ignition source, or fuel, **or cause classification** that has no evidence to support it even though all other such hypothesized elements were eliminated.²²

20.5.1 (formerly in Chapter 21 "Analyzing the Incident for Cause and Responsibility) Nature of Responsibility. The nature of responsibility in a fire or explosion incident may be in the form of an act or omission. It may be something that was done, accidentally or intentionally, that ultimately brought about the fire or explosion, or it may be some failure to act to correct or prevent a condition that caused the incident, fire/smoke spread, injuries, or damage. **Responsibility may be attributed to a fire or explosion event notwithstanding the classification determination of the fire cause: natural, accidental, incendiary, or**

undetermined. Responsibility may be attributed to the accountable person or other entity because of negligence, reckless conduct, product liability, arson, violations of codes or standards, or other means.²³

23.3.3 (formerly in Chapter 24 "Incendiary Fires") Fires Near Service Equipment and Appliances. A fire near gas or electrical equipment, appliances, or fireplaces **may be intended to make the fire appear to be from an accidental-cause accident.**²⁴

25.4.1.1 Before it can be concluded that a particular appliance has caused the fire, it should first be established how the appliance generated sufficient heat energy to cause ignition. The type of appliance will dictate whether this heat is possible under normal operating conditions or as a result of abnormal conditions. The next step is to determine the first material ignited and how ignition took place. The most likely ignition scenario(s) will remain after less likely or impossible ignition scenarios have been eliminated. **If no likely ignition scenario exists, either accidental or intentional, then the cause should be classified as is undetermined.**²⁵

The full text and TC substantiations for all of the Second Revisions are available for review in the Second Draft Report available in NFPA 921 Document Information Page (Next Edition tab).²⁶

The NFPA regulations require that the NFPA 921 TC be balloted on each Second Revision. The Second Revision deleting Chapter 20 passed the ballot. Of 33 eligible voters on the TC, two ballots were not returned, 28 members voted affirmative, and three voted negative with comments. Those TC members casting negative votes on any of the Second Revisions are required to provide a comment with their reasons. These comments are available for review in the First Draft Report.²⁷ The comments of two TC members are instructive and provide insights into their negative votes:

Cox, Andrew T: It is a practical reality that public fire investigators are regularly called upon to fulfill the important community service of classifying the fires they investigate. When a community experiences a fire, the most immediate public concern is classification of the fire, namely whether or not the fire was an accident or the result of an intentional criminal act. The more technical specifics of cause (ignition source, first fuel, oxidizer and immediate circumstances that brought them together) are not necessarily as important to the general public. As a result, someone must serve the community need to make a judgement about classification, and in real-world practice, the public fire investigator is often the most informed and professionally capable person to do so. This is true because making a judgement about classification of a fire is inextricably linked to the determination of cause.

While I can appreciate and understand the academic desire to limit a fire investigator's role to the more technical issues of fire cause, a complete deletion of Chapter 20 Classification of Fire Cause from NFPA 921 fails to recognize the practical reality that exists for public fire investigators. Removal of Chapter 20 is at best likely to cause confusion and a lack of uniformity, and at worst result in a reluctance for public

fire investigators to exercise their professional judgment in serving the critical community need for classification of fires. The result may then be that responsibility of classification is left to lesser informed public officials, which can lead to failure of a community to pursue actual fire-related crimes, or worse yet, erroneous determinations of accidental fires to be criminal in nature. Note that I am NOT necessarily endorsing Chapter 20 in its current form in the 2017 Edition of NFPA 921. I believe the existing Chapter 20 could be significantly improved, but I cannot support a complete removal of the Chapter as it undermines the significance and practical reality of a public fire investigator's role in classifying fires for the communities they serve. As a guide, NFPA 921 should continue to provide guidance to public fire investigators on the issue of classification.²⁸

Ost-Prisco, Thomas: I believe the Committee is making a significant mistake by removing all references to fire cause classification from the next Edition. The stated reason in support of this revision is to "decrease confusion." In my opinion this revision will actually create more confusion. In particular, investigators, attorneys and courts depend on fire cause classification in many legal proceedings. Removing all references to classification from the next edition may lead investigators, attorneys and court to conclude that investigators are no longer permitted to classify fires because it is "beyond the scope" of their expertise. Indeed, some attorneys have already begun to argue that fire investigators are not "qualified" to classify fire cause. I strongly recommend the committee reject this removal of the chapter and reconsider revisions instead.²⁹

The deletion of Chapter 20 from NFPA 921, 2021 ed. is a major change. The history of NFPA 921 has shown that any time a major change has taken place it could take another one or two revision cycles to work out related issues. The NFPA 921 TC welcomes interested persons to submit Public Inputs on this or other topics. After the publication of the 2021 edition, watch for the public notice on the NFPA 921 Document Information Page, Next Edition tab,³⁰ indicating that the next edition is open for Public Input and follow the instructions provided if you want to submit a Public Input.

12. Conclusion

In conclusion, NFPA 921, 2021 edition will no longer have a chapter devoted to fire cause classification. As we have noted in previous articles, change can be stressful and for those who rely on the four-category classification system that has been in NFPA 921 since the guide's inception, there will be some adjustments needed. However, the situation is not as extreme as it may first appear. Following are some implications of this revision:

- √ It does not prevent investigators from characterizing fires as an accident, an accidental fire or an incendiary fire. These definitions remain in NFPA 921, 2021 ed. (See, e.g., the revisions to sections 19.6.5 and 23.3.3, quoted above.) It simply means that NFPA 921 no longer provides its own "classification" system.
- √ Nor does this change prevent an investigator from concluding that a fire cause is undetermined. (See, e.g., the change to 25.4.1.1, quoted above)

- √ It does not prevent investigators from classifying fires. It just removes the four-category classification system from NFPA 921. Government agencies and private organizations are free to select the classification system that best suits their needs, either from those now listed in 19.8 or elsewhere.
- √ It does not prevent the person completing the classifications in an incident report from relying on data from the investigation report, whether the incident report is prepared by the fire investigator or another person.
- √ NFPA 921, 2021 ed. does not say investigators are not "qualified" to classify fires. NFPA 921 is not a qualification standard. If investigators feel a special need to determine if they are qualified for completing incident reports, they should look to the guidelines of the relevant incident reporting system or to NFPA 1033 *Standard for Professional Qualifications of Fire Investigator*.
- √ Some investigators might feel a loss because the weight of NFPA 921, which some courts have called a "gold standard" will no longer be available to support an investigator's classification of a fire cause. However, the national classification systems are also developed by reputable organizations. Further these other classification systems are revised with the advancement of knowledge about fire incidents, whereas the four-category classification system in NFPA 921 was largely stagnant.

In closing, while there will be some adjustments needed to transfer to a different classification system for those who have been using NFPA 921's four-category system, the bottom line should be that we are all committed to the continued refining of NFPA 921 to become a scientifically sound standard.³¹ This change moves the guide closer to that goal.

13. Acknowledgements

Our thanks to everyone who contributed their insights to the issues covered in this article:

Charles (Randy) Watson, IAAI-CFI, CFEI, F-IAFI (NFPA 921 TC Chair and Member IAAI Board of Directors), and to the following Fire Investigation Standards Committee (FISC) members: Captain Steven J. Avato, Mark A. Beavers, IAAI-CFI, Ross Brogan, AFISM, MA (Fire Investigation), IAAI-CFI, First V.P. Rick Jones, IAAI-CFI(V), MIAAI, Raymond J. Kuk, Major J. Ron McCardle, Paul Messner, Fellow-American Academy of Forensic Sciences, IAAI-FIT, Joe Sesniak, IAAI-CFI, IAAI-CI, CFEI, GIFireE, Joe Toscano, IAAI-CFI, IAAI-CI, and George Wendt, IAAI-CFI (former NFPA 1033 TC Chair).

End Notes

- 1 **Disclaimer:** To the extent that this article contains opinions, they are the opinions of the authors and not of the International Ass'n of Fire Investigators (IAAI), the IAAI Fire Investigation Standards Committee (FISC), or the National Fire Protection Association.
- 2 *NFPA Codes & Standards/ All codes & standards/ List of NFPA codes & standards/ NFPA 921, NAT'L FIRE PROT. ASS'N (2020)*, <https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=921&tab=nextedition>.

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- 3 Nat'l Fire Prot. Ass'n Technical Comm. on Fire Investigations, *NFPA 921 Guide for Fire and Explosion Investigations* [hereinafter NFPA 921] (2017 ed.), sec. 20.1. We use the short form, "NFPA 921" when referring generally to this document, in whatever edition is applicable in the context. When referring to a specific edition of *NFPA 921*, the edition is also cited.
- 4 NFPA 921 (2017 ed.), subsecs. 1.1.1 and 1.1.2.
- 5 For more information about OSAC, see *OSAC Organizational Structure*, NAT'L INSTITUTE OF SCI. & TECH., <https://www.nist.gov/topics/organization-scientific-area-committees-forensic-science/osac-organizational-structure> (last updated Jan. 14, 2020)
- 6 *OSAC Registry Webpage*, NAT'L INSTITUTE OF SCI. & TECH., <https://www.nist.gov/topics/organization-scientific-area-committees-forensic-science/osac-registry> (last updated Nov. 19, 2019).
- 7 Gregory Gorbett on behalf of OSAC, Public Input No. 282-NFPA 921-2018 [Chapter 20].
- 8 Nat'l Fire Prot. Ass'n Technical Comm. on Fire Investigations, *First Draft Report*, First Revision No. 111, NFPA 921-2019 (Chapter 20), s. 20.3.2.
- 9 *Supra.* note 8, at s. 20.2.
- 10 *Supra.* note 8, at s. 20.3.1
- 11 See NFPA 921 (2017 ed), subsecs. 1.1.1 & 1.1.2 (distinguishing NFIRS incident reports from investigation reports and stating that the former are outside the scope of the NFPA 921 guide).
- 12 *Supra.* note 8, at s. 20.4.
- 13 *Supra.* note 8, at s. 20.5.
- 14 *Supra.* note 8, at s. 20.5.5.1.
- 15 *Supra.* note 8, at s. 20.5.5.
- 16 Craig Beyler on behalf of OSAC, Public Comment No. 198-NFPA 921-2019 [Chapter 20].
- 17 *Id.*
- 18 Steven Avato, Loudoun County (VA) Fire Marshal's Office, Affiliation "Public Sector," Public Comment No. 247-NFPA 921-2019 [Section No. 20.5.5.2]; Robert Schaal, Gulf Coast Fire, Public Comment No. 248-NFPA 921-2019 [Section No. 20.5.5.2]; Karl Morgan, Division of Investigative and Forensic Services (Florida), Public Comment No. 28-NFPA 921-2019 [Section No. 20.5.5.2].
- 19 Nat'l Fire Prot. Ass'n Technical Comm. on Fire Investigations, *Second Draft Report*, TC Committee Statement, Second Revision No. 15-NFPA 921-2019 [Chapter 20] (substantiating the action of deleting Chapter 20 "Classification of Fire Cause").
- 20 There is one exception to removing all mention of classifying fire causes. In the First Draft Report a proposed revision to Chapter 28 "Wildfire Investigations" was put forward as a First Revision. Amid substantial debate that followed, the TC decided at the Second Draft meeting not to make any changes to the "Wildfire Investigation" chapter at this time and to keep the text as it currently exists in NFPA 921, 2017 ed.. Thus, section 27.8.2 "Human Fire Cause" (formerly 28.8.2) which refers to fire cause classification was reinstated into NFPA 921 as a Second Revision:
27.8.2 (formerly in chapter 28) Human Fire Cause. Human-caused fires are a result of human action or omission and are classified as accidental or incendiary. Accidental fires involve all those for which the proven cause does not involve an intentional human act to ignite or spread fire into an area where the fire should not be.
See Second Revision No. 56-NFPA 921-2019 [Chapter 28]. Further revisions to this section will have to await the next revision cycle of NFPA 921.
- 21 Nat'l Fire Prot. Ass'n Technical Comm. on Fire Investigations, *Second Draft Report*, Second Revision No. 43-NFPA 921-2019 [Section No. 19.6.5].
- 22 Nat'l Fire Prot. Ass'n Technical Comm. on Fire Investigations, *Second Draft Report*, Second Revision No. 11-NFPA 921-2019 [Section No. 19.6.5.1].
- 23 Nat'l Fire Prot. Ass'n Technical Comm. on Fire Investigations, *Second Draft Report*, Second Revision No. 12-NFPA 921-2019 [Section No. 21.5.1].
- 24 Nat'l Fire Prot. Ass'n Technical Comm. on Fire Investigations, *Second Draft Report*, Second Revision No. 45-NFPA 921-2019 [Section No. 24.3.3].
- 25 Nat'l Fire Prot. Ass'n Technical Comm. on Fire Investigations, *Second Draft Report*, Second Revision No. 13-NFPA 921-2019 [Section No. 26.4.1.1].
- 26 *NFPA Codes & Standards/ All codes & standards/ List of NFPA codes & standards/ NFPA 921*, NAT'L FIRE PROT. ASS'N (2020), <https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=921&tab=nextedition>.
- 27 Nat'l Fire Prot. Ass'n Technical Comm. on Fire Investigations, *Second Draft Report*, Second Revision No. 15-NFPA 921-2019 [Chapter 20], Ballot Results.
- 28 Nat'l Fire Prot. Ass'n Technical Comm. on Fire Investigations, *Second Draft Report*, Second Revision No. 15-NFPA 921-2019 [Chapter 20], Ballot Results, Comment by Andrew T. Cox, US Bureau of Alcohol, Tobacco, Firearms & Explosives, submitted with his Negative Vote.
- 29 Nat'l Fire Prot. Ass'n Technical Comm. on Fire Investigations, *Second Draft Report*, Second Revision No. 15-NFPA 921-2019 [Chapter 20], Ballot Results, Comment by Thomas Ost-Prisco, District Attorney's Office, West Chester, PA, submitted with his Negative Vote.
- 30 *NFPA Codes & Standards/ All codes & standards/ List of NFPA codes & standards/ NFPA 921*, NAT'L FIRE PROT. ASS'N (2020), <https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=921&tab=nextedition>.
- 31 In this context, we are using the term "standards" generically. When used in a generic sense, NFPA 921, 2017 ed., s. 3.2.5 states that the term "standards" includes