

CSI - Ohio

The Common Sense Initiative

Business Impact Analysis

Agency Name: Division of Public Safety-Division of EMS

Regulation/Package Title: Fire Service Training Programs

Rule Number(s): OAC rules 4765-20-01 through OAC 4765-20-22

Date June 10, 2013

Rule Type:

X New

X 5-Year Review

X Amended

X Rescinded

The Common Sense Initiative was established by Executive Order 2011-01K and placed within the Office of the Lieutenant Governor. Under the CSI Initiative, agencies should balance the critical objectives of all regulations with the costs of compliance by the regulated parties. Agencies should promote transparency, consistency, predictability, and flexibility in regulatory activities. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

Regulatory Intent

1. Please briefly describe the draft regulation in plain language.

Please include the key provisions of the regulation as well as any proposed amendments.

Chapter 4765-20 of the Ohio Administrative Code (OAC) is authorized to be established under section 4765.55 of the Revised Code (RC). This chapter sets forth the following:

- Qualifications for firefighter and fire safety inspector certificates that need to be met in order for the Executive Director of the State Board of EMS (Executive Director) with advice and counsel of the Firefighter, Fire Safety Inspector Training Committee (FFSI Training Committee) to issue, renew, or reinstate a firefighter or fire safety inspector certificate.*
- The certification cycles and renewal requirements, such as continuing education and instructional hours needed for renewal and reinstatement of all firefighter, fire inspector and fire instructor certificates are also set forth in this chapter.*

Chapter 4765-20 of the OAC is proposed for filing in response to a scheduled RC 119.032 five-year rule review. As the majority of rules in Chapter 4765-20 were reorganized for clarity and consistency, updated to reflect changes in terminology, and revised to more effectively address availability of materials incorporated by reference, the majority of the rules are proposed as new, while simultaneously proposed for rescission. This is due to the fifty percent rule-formatting guideline, which provides for simultaneous adoption/rescission, if it is estimated that changes strike approximately fifty percent of the existing text while adding a comparable amount of new text.

OAC rule 4765-20-01 is being proposed as a rescinded/new rule. This rule prohibits a person from providing firefighting, fire safety inspector, and fire instructor services without possessing the appropriate certificate issued by the Executive Director. This rule is being proposed for amendment to update timelines for renewing a fire certificate. Additionally, language was added to this rule to identify that the dates and availability of materials incorporated by reference are located in rule 4765-11-01 of the OAC.

OAC rules 4765-20-02 and 4765-20-03 are being proposed as rescinded/new rules. These rules set forth the requirements to be issued a firefighter and fire safety inspector certificate by the Executive Director. These rules include the requirement to complete the National Incident Management System (NIMS) courses mandated by the United States' Department of Homeland Security. Also, an applicant for firefighter I or firefighter II will have to complete a course on hazardous materials awareness and operations in order to be eligible for certification. Credit can be granted for the hazardous material course if taken in the past twenty-four months. Additionally, language was added to this rule to identify that the dates and availability of materials incorporated by reference are located in rule 4765-11-01 of the OAC.

OAC rule 4765-20-04 is being proposed as a rescinded/new rule. This rule sets forth the application process for firefighter, fire safety inspector, and instructor. It is being proposed for amendment to

clarify an application that is not completely filled out may be deemed incomplete and not be processed by the Division. Furthermore, it requires the Division to notify the applicant of the deficiencies in the application.

OAC rule 4765-20-05 is being proposed as an amended rule. This rule sets forth the requirement to notify the Division of any change in contact information, no later than thirty days after the change occurred. It was amended due to a needed terminology clarification. Additionally, language was added to this rule to identify that the dates and availability of materials incorporated by reference are located in rule 4765-11-01 of the OAC.

OAC rule 4765-20-06 is being proposed as a rescinded/new rule. This rule sets forth the various examinations utilized by the Division to gain certification as a firefighter, fire safety inspector, and instructor, to include number of permissible attempts and passing scores. Language was also added to clarify the type of examination needed for initial or reinstatement certification.

OAC rule 4765-20-07 is being proposed as a rescinded/new rule. This rule sets forth the renewal requirements to include the completion of continuing education hours for a firefighter and fire safety inspector certificate. The rule was amended to separate firefighter and fire safety inspector into separate paragraphs for clarity sake. The rule now requires the Division to notify each person of the expiration date of the individual's firefighter or fire safety inspector certificate no later than sixty days prior to the expiration date. Additionally, language was added to this rule to identify that the dates and availability of materials incorporated by reference are located in rule 4765-11-01 of the OAC.

OAC rule 4765-20-08 is being proposed as a rescinded/new rule. This rule sets forth the requirements to reinstate a firefighter or fire safety inspector certificate that has expired or has been voluntarily surrendered. Included in this rule are the timelines, examination requirements, continuing education requirements, and application fees for reinstatement. An option was added to the reinstatement process for both firefighter and fire safety inspector certificates. This option sets forth the applicant is not required take the reinstatement examination, if the applicant has met all of the continuing education requirements prior the expiration date of the certificate. The rule incorporates a seventy-five dollar reinstatement fee. Additionally, language was added to this rule to identify that the dates and availability of materials incorporated by reference are located in rule 4765-11-01 of the OAC.

OAC rule 4765-20-09 is being proposed as a rescinded/new rule. This rule sets forth the requirements to reinstate a firefighter or fire safety inspector certificate that was revoked by the Executive Director, to include timelines, examination requirements, and continuing education requirements. The rule was amended to separate firefighter and fire safety inspector into separate paragraphs for clarity sake. Additionally, language was added to this rule to identify that the dates and availability of materials incorporated by reference are located in rule 4765-11-01 of the OAC.

OAC rule 4765-20-10 is being proposed as a rescinded/new rule. This rule sets forth the requirements for grandfathering of firefighter certificates for individuals that were trained prior to July of 1979.

OAC rule 4765-20-11 is being proposed as a rescinded/new rule. This rule sets forth the requirements for applying for firefighter certification by reciprocity for those individuals who were trained in

another state, the District of Columbia, the United States territories, or a branch of the United States military. The rule changes the terminology from equivalency to reciprocity to provide consistency with the terminology used by the EMS Board, other states and the United States military. Additionally, this rule permits the Executive Director to review training received in other states, United States territories, the District of Columbia, and any branch of the United States military in order to grant credit for that training for a firefighter certification in Ohio. Additionally, language was added to this rule to identify that the dates and availability of materials incorporated by reference are located in rule 4765-11-01 of the OAC.

OAC rule 4765-20-12 is being proposed as a rescinded rule. Requirements in this rule can now be found in OAC rule 4765-21-12.

OAC rule 4765-20-13 is being proposed as a rescinded/new rule. This rule sets forth the continuing education requirements needed for a firefighter to renew a firefighter certificate. This rule is being proposed as an amendment to include provisions for firefighter certificate holders who are not affiliated with an Ohio fire department or those who reside outside of Ohio, to have continuing education recognized to comply with renewal requirements. This rule specifies that training received from the National Fire Academy, Fire Department Instructors Conference, Fire-Rescue International and National Domestic Preparedness Consortium may be used to fulfill the continuing education requirements.

OAC rule 4765-20-14 is being proposed as a rescinded/new rule. This rule sets forth the option for a volunteer firefighter to upgrade to a firefighter I through a transition course taught by a certified instructor through a fire charter training program. The hours used to transition may count towards the continuing education hours required for renewal of the volunteer firefighter certificate.

OAC rule 4765-20-15 is being proposed as a rescinded/new rule. This rule sets forth the option for a firefighter I to upgrade to a firefighter II through a transition course taught by a certified instructor through a fire charter training program. The hours used to transition may count towards the continuing education hours required for renewal of the firefighter I certificate.

OAC rule 4765-20-16 is being proposed as a rescinded/new rule. This rule sets forth fire safety inspector continuing education requirements. The proposed change includes a requirement to complete not less than four hours of continuing education pertaining to the fire code, within six months of a new fire code being adopted.

OAC rule 4765-20-17 is being proposed as a rescinded/new rule. This rule sets forth the process for requesting and granting a firefighter or fire safety inspector a partial or full exemption from the continuing education renewal requirements for active duty military, medical hardships, and other unusual circumstances. Proposed changes include submitting a request on a form approved by the Executive Director, adding an eighteen month window from discharge of active duty military for a firefighter or fire safety inspector to apply for an exemption. The ninety day window to request a medical or unusual circumstance exemption was removed from the rule. Additionally, language was added to this rule to identify that the dates and availability of materials incorporated by reference are located in rule 4765-11-01 of the OAC.

OAC rule 4765-20-18 is being proposed as a rescinded/new rule. This rule sets forth the process for a certificate holder to voluntarily surrender his/her firefighter or fire safety inspector certificate. Proposed change allows for the Executive Director's discretion to accept surrender even if the certificate is under investigation.

OAC rule 4765-20-19 is being proposed as an amended rule. This rule sets forth the initial renewal of a firefighter certification on or before January 24, 2009. This rule clarifies the pro-rated continuing education requirements for firefighter certification. Proposed changes reflect terminology change from "first responder or EMT" to "EMS provider" as set forth in rule 4765-1-01 of the OAC and adding the deadline date for compliance.

OAC rule 4765-20-20 is being proposed as an amended rule. This rule sets forth the initial renewal of a fire safety inspector or certification on or before January 24, 2009. This rule clarifies the pro-rated continuing education requirements for firefighter certification. Proposed changes reflect terminology change from "first responder or EMT" to "EMS provider" as set forth in rule 4765-1-01 of the OAC and adding the deadline date for compliance.

OAC rule 4765-20-21 is being proposed as an amended rule. This rule sets forth the initial renewal of active fire instructor certification on or before January 24, 2009. This rule clarifies the requirements for issuance of active fire instructor certification. Proposed changes reflect terminology change from "first responder or EMT" to "EMS provider" as set forth in rule 4765-1-01 of the OAC and adding the deadline date for compliance.

OAC rule 4765-20-22 is being proposed as an amended rule. This rule sets forth the initial certification cycles and continuing education requirements for firefighter, fire safety inspector, or instructor certifications. If an applicant for any fire certificate is also certified as an EMS provider, the certificates will be issued to expire on the individual's date of birth in the same year. Proposed changes reflect terminology change from "first responder or EMT" to "EMS provider" as set forth in rule 4765-1-01 of the OAC.

OAC rule 4765-20-23 is being proposed as a rescinded/new rule. This rule sets forth the merging of fire service training and fire instructor certificates with EMS certificates to a common expiration date, the certificate holder's date of birth that was required to take place no later than March 31, 2011.

2. Please list the Ohio statute authorizing the Agency to adopt this regulation.

RC sections 4765.04 and 4765.55.

3. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program?

If yes, please briefly explain the source and substance of the federal requirement.

No, the regulation does not implement a federal requirement.

4. If the regulation includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.

The regulation does not implement a federal requirement.

5. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?

Pursuant to section 4765.55 of the Revised Code, the Executive Director, with the advice and counsel of the FFSI Training Committee, is statutorily required to adopt rules that establish the requirements and procedures for obtaining and renewing firefighter and fire safety inspector. Chapter 4765-20 of the OAC sets forth the requirements and qualifications for issuance and renewal of a firefighter or fire safety inspector certificate to include continuing education hours. Additionally, the law mandates that credit shall be given for local training; which has been incorporated into the rules within this chapter by allowing the fire chief to approve continuing education.

6. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?

Success will be measured by the number of certificates issued by the Executive Director to firefighters, fire safety inspectors and fire instructors. In 2012, the Division issued initial certifications to 2,727 firefighters, 259 fire safety inspectors, and 238 instructors. Ohio has a grand total of 10,068 certified fire safety inspectors, 8,442 certified instructors, and 41,463 certified firefighters.

Both applicants for initial and renewal of their fire certificates are able to utilize an online application system that can immediately process an application. The Division will monitor this online process for efficiency and ease of process to apply and receive certification by conducting quality assurance reviews of the system through reports and internal audits.

Additionally, success will also be measured by the compliance with the renewal requirements to include continuing education and instructional hours. The Division conducts random audits on a monthly basis to determine compliance with the renewal requirements. Each audit is reviewed to determine if all continuing education or instructional hours are met for the past certification cycle. If a person is not in compliance, the Executive Director can issue disciplinary sanctions. More individuals in compliance will result in fewer disciplinary sanctions issued by the Executive Director.

Development of the Regulation

7. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.

If applicable, please include the date and medium by which the stakeholders were initially contacted.

The FFSI Training Committee held meetings to discuss the draft rules and requested stakeholder participation in this process from a wide range of representation of the Ohio fire service. On September 20, 2012, an invitation to participate in a rule review forum was e-mailed to a specific list of stakeholders comprised of membership from Ohio fire service organizations. Each organization

was invited to send representation to the public forum. Stakeholders invited included, but were not limited to, fire chiefs, firefighters, fire instructors, fire safety inspector instructors, fire safety inspectors, program directors and other personnel. A forum was held at the Ohio Department of Public Safety on November 1, 2012. The stakeholders were provided copies of all draft rules and asked to provide their expertise and opinions regarding the content of these rules. After the forum, the Executive Director and the FFSI Training Committee met on November 13, 2012 and reviewed all of the stakeholder input. Advice and counsel was given to the Executive Director for his consideration on the rules. The FFSI Training Committee reviewed the comments from the stakeholders and the revised rules containing the solicited input were emailed to the stakeholders on December 12, 2012.

The following organizations were represented on the rule forum on November 1, 2012:

The following organizations were represented:

Ohio State Firefighters' Association

Columbus Fire Department

Ohio Association of Professional Fire Fighters

Ohio Fire Chiefs' Association

Ohio Fire Official Association

Violet Township Fire Department/Ohio Society of Fire Service Instructors

Clark State Community College/Ohio Society of Fire Service Instructors

Ohio Fire Charter Collaborative / Ohio Fire Training Academy

State Board of EMS Members

State Fire Marshal /Ohio Fire Academy

Ohio Fire Charter Collaborative

The FFSI Training Committee reviewed the comments from the stakeholders and forwarded the revised rules to the stakeholders.

8. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?

Stakeholders provided professional expertise, professional experiences and feedback to the rule regulation process. The stakeholders' input ensures that regulations were both reasonable and congruent with statutory requirements in RC section 4765.55. The rule changes and suggestions were discussed at length with the stakeholders.

Stakeholders Discussion on November 1, 2012

4765-20-08 Reinstatement of a certificate of firefighter or fire safety inspector training.

- *If a certificate of firefighter training has expired, or becomes invalid due to voluntary surrender, for eighteen months or longer, the applicant must complete a new course of instruction and meet all qualifications for a certificate of firefighter training as provided in rule 4765-20-02 of the Administrative Code.*

- A fire safety inspector certificate has expired, or becomes invalid due to voluntary surrender, for eighteen months or longer the applicant must complete a new course of instruction and meet all qualifications for a fire safety inspector certificate as provided in rule 4765-20-03 of the Administrative Code. An applicant must meet all requirements.

Stakeholders input: A stakeholder raised the question of whether or not the eighteen-month timeline should be changed to a three-year requirement.

Result: The eighteen month timeframe was not expanded, due to the concern of possible diminishment in critical skills after being out of practice for eighteen months; however, additional reinstatement options were added to the rule to ease re-entry into the fire service.

4765-20-11 Equivalency for a certificate of fire service training.

- Fire service training certificates may be issued by reciprocity to applicants who hold a current and valid firefighter certificate or license from another state, the District of Columbia, or a United States territory, and who have received training outside of Ohio.

Stakeholders input: A stakeholder suggestion to clarify this rule by stating the training course should be “equal to or more” of the same number of course hours not “approximately.”

Result: The Executive Director clarified this rule. Verbiage revised to require demonstration that an applicant has completed a training course that is equal to or exceeds the training standards are curriculum as set forth in Chapter 4765-11 of the OAC.

4765-20-13 Firefighter continuing education.

- When applying for renewal of a firefighter certificate, an applicant shall have completed at least fifty-four hours of continuing education related to fire service training.
- ...continuing education credits shall be approved by one of the following: (1) The program director of a chartered program; or (2) The fire chief of the applicant's affiliated fire department.

Stakeholders Input: A stakeholder mentioned that non-affiliated certificate holders are concerned about losing their cards. Instructors would like to receive continuing education credit for instructing.

Result: Revisions were made to this rule to give additional options to assist non-affiliated certificate holders with meeting the continuing education requirements. The Executive Director decided that the rules will mirror EMS Board's policy on the issue of receiving credit for instruction; therefore credit can be granted. OEMS staff reviewed language and revised to accommodate this request.

4765-20-16 Fire safety inspector continuing education.

- When applying for renewal of a fire safety inspector certificate, a person certified as a fire safety inspector shall document compliance with the following continuing education requirements:

- **(A)** Completion of a total of not fewer than thirty hours of continuing education

Stakeholders Input: A stakeholder questioned whether or not fire inspectors should be forced to update their education on new fire codes.

Results: The Executive Director, with advice and counsel of the FFSI training committee, incorporated the requirement of four hours of continuing education regarding new fire codes as requested by the Ohio Fire Officer Association. Language was added to the rule to clarify, if a new fire code is adopted by the state of Ohio, a fire safety inspector shall attend continuing education of not less than four hours related to the new fire code. The continuing education shall be completed within six months of the adoption of the new fire code. The fire safety inspector shall maintain documentation of completion of this update. These four hours may be counted towards the thirty hour continuing education requirement.

9. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?

There was no scientific data to be considered.

10. What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives?

The Executive Director along with the FFSI Training Committee considered alternative regulations and provisions that were voiced by stakeholders. The Executive Director approved changes to the rules to include adding the option in the reinstatement rule, to allow a lapsed certificate holder the ability to provide documentation of successful completion of continuing education in lieu of taking the knowledge examination. Also, additional methods to obtain continuing education were added to the rules, to assist non-affiliated certificate holders or certificate holders who live outside of Ohio comply with the continuing education renewal requirements. Additionally, fire inspectors are required to receive training on the fire code, when a new fire code is adopted.

11. Did the Agency specifically consider a performance-based regulation? Please explain.

Performance-based regulations define the required outcome, but don't dictate the process the regulated stakeholders must use to achieve compliance.

No. These regulations do not offer the flexibility for performance-based regulations.

12. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?

The Division has reviewed all applicable Ohio Revised Code and Ohio Administrative Code provisions relating to certification processes for volunteer firefighters, firefighters I and II, fire safety inspectors, fire instructors, and fire safety inspector instructors. In addition, state administrators, stakeholders,

field specialists and staff members conducted an extensive review of the rules promulgated under RC section 4765.55 to ensure that the regulations were not duplicated in Ohio.

13. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.

Using the Division's website and EMS listserv, the Division will provide stakeholders with notice of the final filed rules and the effective date. The Division will draft and post summaries of the rule content and changes on both the Division's website and the EMS listserv. Division staff will make presentations regarding the rule changes at both state and local fire training and education conferences. The Division will also use also publications such as the Division's newsletter, "The Siren," the Ohio Fire Chiefs' "In Command" magazine, and the Ohio State Firefighters' Association's "Ohio Firefighters" magazines to notify Ohio's fire service of the rule changes. Status reports will be presented to the FFSI Training Committee. Additionally, a formal report of the rule changes and status are reported during each of the regularly scheduled EMS board meetings. Additionally, annual reports will be compiled and distributed yearly.

Division staff is notified and kept up-to-date of all rule changes and the impact involving enforcement of the amended or newly promulgated rules. The Division has policy and procedures that are followed when reviewing an application for a fire charter and conducting on site reviews of the program requirements. Notification of the rule changes to Division staff will be delivered internally through bi-weekly meetings, as well as cross-training of staff on co-workers' job responsibilities that will increase the overall knowledge and efficiency of the Division.

Adverse Impact to Business

14. Provide a summary of the estimated cost of compliance with the rule. Specifically, please do the following:

- a. Identify the scope of the impacted business community;**
- b. Identify the nature of the adverse impact (e.g., license fees, fines, employer time for compliance); and**
- c. Quantify the expected adverse impact from the regulation. *The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a "representative business." Please include the source for your information/estimated impact.***
 - a. Ohio has 10,068 certified fire safety inspectors and 41,463 certified firefighters.*
 - b. Costs include time and tuition costs or fees for continuing education training hours for renewal of firefighter and fire safety inspector certificates. Each firefighter is required to complete on average seventeen hours per year. This cost could be incurred by the firefighter or by the department. For most firefighters who are affiliated with a fire department, no cost is incurred by the firefighter because departments provide continuing education via in-service*

training while the firefighter is on scheduled duty time: therefore a cost is not incurred. Additionally, if a firefighter or fire safety inspector allows the certificate to expire, the individual could be faced with a reinstatement fee of \$75.00.

- c. Costs for compliance with continuing education can range from zero to \$750 dollars per year depending on whether or not an individual's department provides in-service training or not. This is based on the average wages of a career firefighter at time and a half.*

OAC Chapter 4765-20 incorporates the option to allow firefighters and fire safety inspectors who have allowed their certificate to expire, to reinstate their certificates, providing all other continuing education requirements were met prior to the expiration of the current certificate. In lieu of sitting for the reinstatement test, the applicant can submit a \$75.00 application fee and provide proof of continuing education in order to reinstate the certificate. Although this \$75 fee is a new cost, it is a reduced cost to comply with the reinstatement process because it costs an individual at least \$150 to take the reinstatement test, which is eliminated in the rule. Additionally, these regulations will bring consistency to the individual EMS and fire certification requirements and was well received by our stakeholders.

15. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?

The community demands a well-trained firefighting force to respond to emergencies. The regulatory intent is to improve emergency response to save lives and properties and reduce fatalities and injuries in the firefighting force.

Fire inspector continuing education hours improve quality of fire safety inspecting resulting in reduced incidents of fire, which in turn reduces property loss and reduces firefighter and civilian fatalities and injuries.

Regulatory Flexibility

16. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.

Chapter 4765-20 of the OAC provides several means of alternative compliance including options for reinstatement without further examinations, certificates issued by reciprocity, exemptions from continuing education hour due to military deployment, medical reasons, and other unusual circumstances. This chapter is consistent with the rules that regulate EMS certifications.

Additionally there are many different sources for a firefighter or fire safety inspector to obtain continuing education at no or little cost. Seminars, online training, and in-house training may be used to fulfill the continuing education renewal requirements.

17. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?

The Executive Director, with advice and counsel of the FFSI training committee, reviews each violation on a case-by-case basis in order to ensure compliance with RC section 119.04. The FFSI Training Committee will counsel and advise the Executive Director on all disciplinary actions and matters regarding waiver of fines or sanctions. The Executive Director is obligated by RC Chapter 119. to afford individuals their due process rights when there are RC Chapter 4765. and OAC Chapter 4765-20 violations. The Executive Director has full discretion on issuing discipline.

18. What resources are available to assist small businesses with compliance of the regulation?

Ohio Administrative Code Chapter 4765-20 is supported by the Division's website, which contains a fire section that has the fire training curricula, course objectives, written testing software, practical skill sheets, testing policies and procedures, and a certification verification system, all at no cost to students or fire departments. The Division's website also makes available links to continuing education requirements, Ohio laws and rules, investigative policy and procedures. The Division provides staff assistance via telephone, email, Ask EMS, and site visits to the chartered training programs. The Executive Director issues firefighter, fire safety inspector and instructor certifications and fire charters at no cost to the certificate holder. Fire certificate holders utilize the free online renewal system to renew their certificates. No fees are associated with obtaining these certificates.