



COLORADO

**Department of
Regulatory Agencies**

Colorado Office of Policy, Research &
Regulatory Reform

2025 Sunset Review

Fire Suppression Registration and
Inspection Program



October 15, 2025



COLORADO

**Department of
Regulatory Agencies**

Executive Director's Office

October 15, 2025

Members of the Colorado General Assembly
c/o the Office of Legislative Legal Services
State Capitol Building
Denver, Colorado 80203

Dear Members of the General Assembly:

The Colorado General Assembly established the sunset review process in 1976 as a way to analyze and evaluate regulatory programs and determine the least restrictive regulation consistent with the public interest. Pursuant to section 24-34-104(5)(a), Colorado Revised Statutes (C.R.S.), the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) at the Department of Regulatory Agencies (DORA) undertakes a robust review process culminating in the release of multiple reports each year on October 15.

A national leader in regulatory reform, COPRRR takes the vision of their office, DORA and more broadly of our state government seriously. Specifically, COPRRR contributes to the strong economic landscape in Colorado by ensuring that we have thoughtful, efficient, and inclusive regulations that reduce barriers to entry into various professions and that open doors of opportunity for all Coloradans.

As part of this year's review, COPRRR has completed an evaluation of the Fire Suppression Registration and Inspection Program. I am pleased to submit this written report, which will be the basis for COPRRR's oral testimony before the 2026 legislative committee of reference.

The report discusses the question of whether there is a need for the regulation provided under Article 33.5 of Title 24, C.R.S. The report also discusses the effectiveness of the Department of Public Safety's Division of Fire Prevention and Control in carrying out the intent of the statutes and makes recommendations for statutory changes for the review and discussion of the General Assembly.

To learn more about the sunset review process, among COPRRR's other functions, visit coprrr.colorado.gov.

Sincerely,

Patty Salazar
Executive Director





Fire Suppression Registration and Inspection Program

Background

What is regulated?

Fire suppression systems, such as fire sprinklers, are used in buildings to automatically detect and extinguish fires. The Colorado Fire Suppression Registration and Inspection Program (Program), located in the Department of Public Safety's Division of Fire Prevention and Control (Division), registers fire suppression contractors, approves design plans of fire suppression systems, and qualifies inspectors of such systems.

Why is it regulated?

Installation and inspection of fire suppression systems require highly technical expertise. Given that such systems are critical to securing the safety of a building and its occupants, the Program works to ensure that contractors and inspectors are properly qualified.

Who is regulated?

The Program registers five types of contractors and certifies two types of inspectors. In fiscal year 23-24, the Program registered a total of 763 contractors and certified 357 inspectors.

How is it regulated?

Contractors and inspectors must submit their credentials to the Division prior to completing any work on fire suppression systems. The Program also inspects fire suppression systems in public schools, hospitals, and in areas that do not have a local authority to do so.

What does it cost?

In fiscal year 23-24, the Division expended \$272,946 and allotted 1.4 full-time equivalent employees to Program activities.

What disciplinary activity is there?

During fiscal year 23-24, a total of 28 complaints were made to the Division, resulting in 19 disciplinary actions.

Key Recommendations

- Continue the Program for 11 years, until 2037.

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Background

Sunset Criteria

Enacted in 1976, Colorado's sunset law was the first of its kind in the United States. A sunset provision repeals all or part of a law after a specific date, unless the legislature affirmatively acts to extend it. During the sunset review process, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) within the Department of Regulatory Agencies (DORA) conducts a thorough evaluation of such programs based upon specific statutory criteria¹ and solicits diverse input from a broad spectrum of stakeholders including consumers, government agencies, public advocacy groups, and professional associations.

Sunset reviews are guided by statutory criteria and sunset reports are organized so that a reader may consider these criteria while reading. While not all criteria are applicable to all sunset reviews, the various sections of a sunset report generally call attention to the relevant criteria. For example,

- In order to address the first criterion and determine whether the program under review is necessary to protect the public, it is necessary to understand the details of the profession or industry at issue. The Profile section of a sunset report typically describes the profession or industry at issue and addresses the current environment, which may include economic data, to aid in this analysis.
- To address the second sunset criterion--whether conditions that led to the initial creation of the program have changed--the History of Regulation section of a sunset report explores any relevant changes that have occurred over time in the regulatory environment. The remainder of the Legal Framework section addresses the fifth sunset criterion by summarizing the organic statute and rules of the program, as well as relevant federal, state and local laws to aid in the exploration of whether the program's operations are impeded or enhanced by existing statutes or rules.
- The Program Description section of a sunset report addresses several of the sunset criteria, including those inquiring whether the agency operates in the public interest and whether its operations are impeded or enhanced by existing statutes, rules, procedures and practices; whether the agency or the agency's board performs efficiently and effectively and whether the board, if applicable, represents the public interest.
- The Analysis and Recommendations section of a sunset report, while generally applying multiple criteria, is specifically designed in response to the fourteenth criterion, which asks whether administrative or statutory changes are necessary to improve agency operations to enhance the public interest.

¹ Criteria may be found at § 24-34-104, C.R.S.

These are but a few examples of how the various sections of a sunset report provide the information and, where appropriate, analysis required by the sunset criteria. Just as not all criteria are applicable to every sunset review, not all criteria are specifically highlighted as they are applied throughout a sunset review. While not necessarily exhaustive, the table below indicates where these criteria are applied in this sunset report.

Table 1
Application of Sunset Criteria

Sunset Criteria	Where Applied
(I) Whether regulation or program administration by the agency is necessary to protect the public health, safety, and welfare.	• Profile of the Industry • Legal Framework • Recommendation 1
(II) Whether the conditions that led to the initial creation of the program have changed and whether other conditions have arisen that would warrant more, less, or the same degree of governmental oversight.	• Legal Framework • Recommendation 1 • Administrative Recommendation 1
(III) If the program is necessary, whether the existing statutes and regulations establish the least restrictive form of governmental oversight consistent with the public interest, considering other available regulatory mechanisms.	• Legal Framework
(IV) If the program is necessary, whether agency rules enhance the public interest and are within the scope of legislative intent.	• Legal Framework • Administrative Recommendation 1
(V) Whether the agency operates in the public interest and whether its operation is impeded or enhanced by existing statutes, rules, procedures, and practices and any other circumstances, including budgetary, resource, and personnel matters.	• Legal Framework • Program Description and Administration
(VI) Whether an analysis of agency operations indicates that the agency or the agency's board or commission performs its statutory duties efficiently and effectively.	• Program Description and Administration
(VII) Whether the composition of the agency's board or commission adequately represents the public interest and whether the agency encourages public participation in its decisions rather than participation only by the people it regulates.	• Not Applicable
(VIII) Whether regulatory oversight can be achieved through a director model.	• Program Description and Administration
(IX) The economic impact of the program and, if national economic information is not available, whether the agency stimulates or restricts competition.	• Profile of the Industry

Sunset Criteria	Where Applied
(X) If reviewing a regulatory program, whether complaint, investigation, and disciplinary procedures adequately protect the public and whether final dispositions of complaints are in the public interest or self-serving to the profession or regulated entity.	• Complaint Activity • Disciplinary Activity
(XI) If reviewing a regulatory program, whether the scope of practice of the regulated occupation contributes to the optimum use of personnel.	• Program Description and Administration
(XII) Whether entry requirements encourage equity, diversity, and inclusivity.	• Program Description and Administration • Recommendation 2
(XIII) If reviewing a regulatory program, whether the agency, through its licensing, certification, or registration process, imposes any sanctions or disqualifications on applicants based on past criminal history and, if so, whether the sanctions or disqualifications serve public safety or commercial or consumer protection interests. To assist in considering this factor, the analysis prepared pursuant to subsection (5)(a) of this section must include data on the number of licenses, certifications, or registrations that the agency denied based on the applicant's criminal history, the number of conditional licenses, certifications, or registrations issued based upon the applicant's criminal history, and the number of licenses, certifications, or registrations revoked or suspended based on an individual's criminal conduct. For each set of data, the analysis must include the criminal offenses that led to the sanction or disqualification.	• Program Description and Administration
(XIV) Whether administrative and statutory changes are necessary to improve agency operations to enhance the public interest.	• Program Description and Administration • Recommendations 1 and 2 • Administrative Recommendation 1

Sunset Process

Regulatory programs scheduled for sunset review receive a comprehensive analysis. The review includes a thorough dialogue with agency officials, representatives of the regulated profession and other stakeholders. Anyone can submit input on any upcoming sunrise or sunset review on COPRRR's website at coprrr.colorado.gov.

The functions of the Fire Suppression Registration and Inspection Program (Program) and Department of Public Safety's Division of Fire Prevention and Control (Division), as enumerated in Article 33.5 of Title 24, Colorado Revised Statutes (C.R.S.), shall terminate on September 1, 2026, unless continued by the General Assembly. During the year prior to this date, it is the duty of COPRRR to conduct an analysis and evaluation of the Program pursuant to section 24-34-104, C.R.S.

The purpose of this review is to determine whether the currently prescribed regulation should be continued and to evaluate the performance of the Program and the Division. During this review, Program staff must demonstrate that the Program serves the public interest. COPRRR's findings and recommendations are submitted via this report to the Office of Legislative Legal Services.

Methodology

As part of this review, COPRRR staff interviewed Program staff, practitioners, fire marshals, and officials with state and national professional associations; and reviewed Colorado statutes and rules.

The major contacts made during this review include, but are not limited to:

- American Fire Sprinkler Association
- Colorado Department of Public Safety
- Colorado Division of Fire Prevention and Control
- Colorado Fire Chiefs
- Colorado Sprinkler Advisory Board
- Fire Marshal's Association of Colorado
- Sprinkler Fitters Union - UA Local 669

Profile of the Industry

In a sunset review, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) is guided by the sunset criteria located in section 24-34-104(6)(b), C.R.S. The first criterion asks whether regulation or program administration by the agency is necessary to protect the public health, safety, and welfare.

To understand the need for regulation, it is first necessary to recognize what fire suppression systems are, where they are installed and how they work.

The first modern version of a fire suppression system was installed at London's Theatre Royal in 1812. It involved an airtight reservoir containing 100 tons of water that would feed into smaller pipes pierced with holes, thus creating a sprinkler effect. The first commercial sprinkler system was then invented in 1874 by Henry S. Parmalee in Connecticut to protect his piano shop. If a fire broke out, the heat would shatter a bulb placed within each individual sprinkler head and release water.²

Currently, the use of fire suppression systems is ubiquitous. They serve as effective methods for fighting the onset of fires before they spread and cause harm to people or property. Sprinklers, for example, react quickly to reduce heat, flames, and smoke, which provides individuals an opportunity to evacuate. In homes that do not have systems, a fire may grow to perilous levels before emergency services arrive.

Fire sprinkler systems typically contain networks of pipes supplied with water and sprinkler heads fitted at recommended intervals. Sprinkler heads can be placed in various locations in a building such as ceilings or side walls.³ Typically, sprinklers over the fire should be the only heads that activate. The others remain closed to limit damage and reduce the amount of water needed.

Because sprinkler systems are used in numerous settings, different types have developed over time. Each type has its own unique set of characteristics that protect the type of building and property where it is installed. Common sprinkler systems include:⁴

- Wet pipe,
- Dry pipe,
- Pre-action, and
- Deluge.

² IFSEC Insider. *A History of Fire Sprinklers*. Retrieved September 10, 2025, from <https://www.ifsecglobal.com/fire-news/a-history-of-fire-sprinklers/>

³ International Fire and Security Exhibition and Conference. *Fire sprinkler systems: A beginner's guide*. Retrieved September 10, 2025, from <https://www.ifsecglobal.com/fire-sprinkler-systems>

⁴ National Fire Protection Association. *Sprinkler System Basics: Types of Sprinkler Systems*. Retrieved September 10, 2025, from <https://www.nfpa.org/news-blogs-and-articles/blogs/2021/03/26/sprinkler-system-basics-types-of-sprinkler-systems>

Wet pipe sprinklers are the most commonly used form of sprinklers. Hot gases from fires raise temperature drastically. When the area close to the sprinkler head rises to a specific temperature, the sprinkler head will sense the heat and activate, triggering water to flow through the sprinkler directly onto the fire.⁵

While sprinkler systems are popular, there are other suppression systems that also work to control fires. Clean agent fire suppression systems refer to systems that release a gaseous fire suppressant that is electrically nonconducting and does not leave residue upon evaporation. Such systems are ideal for protecting items like historical artifacts or sensitive electronic equipment.⁶ There are also wet and dry chemical suppression systems. These spray chemicals in the form of powder or foam to mitigate fires.⁷ Range hoods, which are placed in kitchens over items like stovetops and ovens, are also considered a mechanism to control fires.⁸

Regulatory jurisdictions have different meanings for fire suppression systems. Colorado defines a fire suppression system as:⁹

an assembly of any or all of the following: Piping valves, conduits, dispersal openings, sprinkler heads, orifices, and other similar devices that convey extinguishing agents for the purpose of controlling, confining, or extinguishing fire, with the exception of multipurpose residential fire sprinkler systems in one- and two-family dwellings and townhouses that are part of the potable water supply, pre-engineered range hoods, duct systems, and portable fire extinguishers.

Installations must be performed by a registered contractor¹⁰ and inspected by a qualified inspector.¹¹ The Program registers installation contractors, certifies inspectors, and inspects fire suppression systems in public schools, hospitals, and in areas that do not have a local authority qualified to do so.¹² Local authorities that are qualified must follow the Division's standards for inspection.

From 2017 to 2021, sprinklers were triggered in 92 percent of reported fires. They were effective at controlling the fire in 97 percent of these incidents. When sprinklers were present in buildings, the civilian fire death and injury rates per fire were 90 percent

⁵ *Id.*

⁶ National Fire Protection Association. *Clean Agent System Basics*. Retrieved September 10, 2025, from <https://www.nfpa.org/news-blogs-and-articles/blogs/2022/05/06/clean-agent-system-basics>

⁷ National Firefighter Corporation. *Wet Chemical vs. Dry Chemical Fire Suppression Systems*. Retrieved September 10, 2025, from https://www.nationalfirefighter.com/blog/Wet-Chemical-vs-Dry-Chemical-Fire-Suppression-Systems?srsId=AfmBOoo_xEReTDfx3VFogbOqeQOcauKV0KQ3aY21ckaauyQhZP322JWD

⁸ Town Appliance. *The Role of Ventilation Hoods in Fire Safety*. Retrieved October 2, 2025, from https://www.townappliance.com/blogs/town-appliance-official/the-role-of-ventilation-hoods-in-fire-safety?srsId=AfmBOormG80zNwE56bXD3BpwcIGPE4JU108ILO6hNCOeBloKX7r_e17S

⁹ § 24-33.5-1202(6), C.R.S.

¹⁰ § 24-33.5-1206.1, C.R.S.

¹¹ § 24-33.5-1206.3, C.R.S.

¹² § 24-33.5-1204.5, C.R.S.

and 32 percent lower, respectively. The rate of firefighter injuries per fire was 35 percent lower.¹³

The ninth sunset criterion questions the economic impact of the program and, if national economic information is not available, whether the agency stimulates or restricts competition.

In 2023, there were an estimated 344,600 residential building fires.¹⁴ The leading causes of residential fires were as follows:¹⁵

- Cooking fires, with 167,800;
- Unintentional fires, with 31,500;
- Heating fires, with 27,900; and
- Electrical malfunction fires, with 23,700.

The largest monetary harm for residential buildings resulted from unintentional fires. There was an estimated loss of \$2.5 billion nationwide in 2023.¹⁶ The average fire restoration costs in 2025 are \$27,175.¹⁷

Overall, there are fewer commercial fires. However, they also cause significant damage. There were an estimated 110,000 commercial building fires in 2023.¹⁸ The leading causes of commercial fires were as follows:¹⁹

- 33,300 cooking fires;
- 14,300 intentional fires; and
- 13,800 unintentional fires.

Despite being the lowest number in terms of causation, unintentional fires cause the most monetary damage in commercial buildings. In 2023, there was an estimated \$881 million in losses from unintentional commercial building fires.²⁰

¹³ National Fire Protection Association. *U.S. Experience with Sprinklers*. Retrieved September 10, 2025, from <https://www.nfpa.org/education-and-research/research/nfpa-research/fire-statistical-reports/us-experience-with-sprinklers>

¹⁴ U.S. Fire Administration. *Residential Fire Estimate Summaries (2014-2023)*. Retrieved September 10, 2025, from <https://www.usfa.fema.gov/statistics/residential-fires/>

¹⁵ U.S. Fire Administration. *Residential Building Fire Causes (2014-2023)*. Retrieved September 10, 2025, from <https://www.usfa.fema.gov/statistics/residential-fires/causes.html>

¹⁶ U.S. Fire Administration. *Residential Building Other Unintentional, Careless Fire Trends (2014-2023)*. Retrieved September 10, 2025, from <https://www.usfa.fema.gov/statistics/residential-fires/careless.html>

¹⁷ Angi. *How Much Does Fire Damage Restoration Cost? [2025 Data]*. Retrieved September 10, 2025, from <https://www.angi.com/articles/how-much-does-fire-damage-restoration-cost.htm>

¹⁸ U.S. Fire Administration. *Nonresidential Fire Estimate Summaries (2014-2023)*. Retrieved September 10, 2025, from <https://www.usfa.fema.gov/statistics/nonresidential-fires/>

¹⁹ U.S. Fire Administration. *Nonresidential Building Fire Causes (2014-2023)*. Retrieved September 10, 2025, from <https://www.usfa.fema.gov/statistics/nonresidential-fires/causes.html>

²⁰ U.S. Fire Administration. *Nonresidential Building Fire Dollar-Loss Causes (2014-2023)*. Retrieved September 10, 2025, from <https://www.usfa.fema.gov/statistics/nonresidential-fires/dollar-loss.html>

Legal Framework

History of Regulation

In a sunset review, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) is guided by the sunset criteria located in section 24-34-104(6)(b), Colorado Revised Statutes (C.R.S.). The first and second sunset criteria question:

Whether regulation or program administration by the agency is necessary to protect the public health, safety, and welfare; and

Whether the conditions that led to the initial creation of the program have changed and whether other conditions have arisen that would warrant more, less or the same degree of governmental oversight.

One way that COPRRR addresses this is by examining why the program was established and how it has evolved over time.

The Colorado Fire Suppression Registration and Inspection Program (Program) began on January 1, 1991. The Program is housed in the state's Division of Fire Prevention and Control (Division). The purpose of the Program is to make sure that life safety systems installed in buildings are installed and maintained according to nationally recognized standards.

The Program underwent a sunset review in 2005. In addition to continuing the Program, the 2005 sunset review recommended that the Division should implement a formal recordkeeping system to track complaints and final dispositions, and that the Division should be able to issue letters of admonition. All of these recommendations were adopted by the General Assembly.

Another sunset review took place in 2013. The sunset review recommended continuing the Program and creating a new registration category for residential fire suppression system contractors, both of which were accepted by the General Assembly under House Bill 14-1221.

The next sunset review occurred in 2018. It recommended continuing the Program until 2026. The General Assembly agreed with this recommendation and made no other changes that year.

In 2022, the Division created a new registration classification known as Fire Suppression System Contractor - Premanufactured. Premanufactured contractors are persons or companies performing work on systems that were already installed in factory-built structures.

In 2025, the General Assembly passed Senate Bill 25-002 which established new, regional building codes for factory-built structures. It removed authority over fire suppression systems of factory-built suppression systems from the Division and clarified that the State Housing Board has jurisdiction.

Legal Summary

The third, fourth, and fifth sunset criteria question:

Whether the existing statutes and regulations establish the least restrictive form of governmental oversight consistent with the public interest, considering other available regulatory mechanisms;

Whether agency rules enhance the public interest and are within the scope of legislative intent; and

Whether the agency operates in the public interest and whether its operation is impeded or enhanced by existing statutes, rules, procedures, and practices and any other circumstances, including budgetary, resource, and personnel matters.

A summary of the current statutes and rules is necessary to understand whether regulation is set at the appropriate level and whether the current laws are impeding or enhancing the agency's ability to operate in the public interest.

Statutes in Part 12 of Article 33.5, Title 24, Colorado Revised Statutes (C.R.S.) (Act), govern the operation of the Division. Part 12 authorizes the entire Division, sections of which are the subject of this sunset review.

The Director of the Division is the administrator (Administrator) of the Program.²¹ The Administrator is required to establish a program for registration of fire suppression contractors.²² The Administrator may charge necessary fees to administer the Program.²³

The Division also regulates the inspection and maintenance of fire suppression systems.²⁴ Fire suppression systems are defined as the following:²⁵

an assembly of any or all of the following: Piping valves, conduits, dispersal openings, sprinkler heads, orifices, and other similar devices that convey extinguishing agents for the purpose of controlling, confining,

²¹ § 24-33.5-1202(1), C.R.S.

²² § 24-33.5-1204.5(1)(a), C.R.S.

²³ § 24-33.5-1204.5(1)(b), C.R.S.

²⁴ § 24-33.5-1204.5(1)(a), C.R.S.

²⁵ § 24-33.5-1202(6), C.R.S.

or extinguishing fire, with the exception of multipurpose residential fire sprinkler systems in one- and two-family dwellings and townhouses that are part of the potable water supply, pre-engineered range hoods, duct systems, and portable fire extinguishers.

The Division is required to maintain records of all applications, complaints, investigations, disciplinary actions, and registrants.²⁶ The Act creates a Fire Suppression Cash Fund (Fund) to be used for the Program.²⁷ Any money from the Program is collected by the Division, transmitted to the State Treasurer, and directly credited to the Fund.²⁸ The Fund is also subject to General Assembly appropriation and does not revert to the state's General Fund.

Contractors

The Act has a mandatory practice provision which states that, “no person shall act, assume to act, or advertise as a fire suppression contractor” who is not registered as a fire suppression contractor with the Division.²⁹ Any individual or company who employs someone to work on a fire suppression system must be registered.³⁰ Entities that are corporations are punished by a fine of not more than \$5,000.³¹ The Act prohibits an unregistered person acting as a contractor from bringing legal action to collect for any services for which registration is required.³²

Applicants must be the principal of the company, which must be recorded with the Secretary of State.³³ Fire suppression contractors carry general liability insurance in the amount of at least \$1 million, which includes coverage related to the installation of fire suppression systems.³⁴ An applicant can be denied if they have been convicted of a crime which reflects upon the integrity of the applicant in operating within the capacity for which they are seeking registration.³⁵

Applicants need not pass an examination to obtain a registration. However, they need to either be or employ a sprinkler fitter to work on job sites.³⁶ Sprinkler fitters, which are not subject to this sunset review, have specific examination requirements in order to be registered.³⁷

²⁶ § 24-33.5-1204.5(1)(d), C.R.S.

²⁷ § 24-33.5-1207.6, C.R.S.

²⁸ § 24-33.5-1207.6(1), C.R.S.

²⁹ § 24-33.5-1206.1(1), C.R.S.

³⁰ 8 CCR § 1507-11-3.1, Fire Suppression Program Rules.

³¹ § 24-33.5-1206.5(1), C.R.S.

³² § 24-33.5-1206.6(4), C.R.S.

³³ 8 CCR § 1507-11-3.3, Fire Suppression Program Rules.

³⁴ 8 CCR § 1507-11-3.4, Fire Suppression Program Rules.

³⁵ 8 CCR § 1507-11-3.10, Fire Suppression Program Rules.

³⁶ 8 CCR § 1507-11-3.6, Fire Suppression Program Rules.

³⁷ 8 CCR § 1507-11-5.2(7), Fire Suppression Program Rules.

Contractor registrations expire on December 31 each year regardless of when the registration was issued, unless previously suspended or revoked.³⁸ Registered fire suppression contractors must also obtain locally required licenses or permits and comply with local building and fire codes.³⁹ Registration is prohibited for any contractor who violated the Act or any of its rules within the previous two years.⁴⁰

Registered fire suppression contractors are responsible for the acts of employees while acting to sell, advertise, install, repair, or inspect fire suppression systems of any kind.⁴¹ A registered contractor must assure that there is a responsible person in its management or employment qualified in the layout, fabrication, installation, alteration, servicing, repair, or inspection of fire suppression systems.⁴²

The specific qualifications and their technical certifications are specified in the rules of the Program, located in 8 Colorado Code of Regulations section 1507-11.

Each job must also be supervised by an onsite installer who is qualified in each of these areas.⁴³ Jobs need to be completed according to applicable standards adopted by the Division and manufacturer's specifications, along with any applicable local codes and ordinances.⁴⁴ Contractors must provide customers with operating instructions for all equipment installed with as-built diagrams of the final installation.⁴⁵ One set of plans and product data sheets must remain on every job site for inspection.⁴⁶

Contractors can hire sprinkler fitters to perform services, and to act as the responsible employee on a job site.⁴⁷ A sprinkler fitter is defined as,⁴⁸

a person other than an apprentice who is registered with the Administrator and who installs fire suppression systems. "Sprinkler fitter" does not include a person who performs maintenance and repair on fire suppression systems as a part of his or her employment. A sprinkler fitter does not include a person who performs work exclusively on cross-connection control devices or a person who performs work exclusively on an underground system. "Sprinkler fitter" does not include a person performing work on his or her own home.

³⁸ 8 CCR § 1507-11-3.5, Fire Suppression Program Rules.

³⁹ § 24-33.5-1206.1(2), C.R.S.

⁴⁰ § 24-33.5-1206.1(5), C.R.S.

⁴¹ § 24-33.5-1206.1(3), C.R.S.

⁴² § 24-33.5-1206.1(4)(a), C.R.S.

⁴³ § 24-33.5-1206.1(4)(b), C.R.S.

⁴⁴ §§ 24-33.5-1206.1(4)(c) and 24-33.5-1206.3(1), C.R.S.

⁴⁵ § 24-33.5-1206.3(2), C.R.S.

⁴⁶ 8 CCR § 1507-11-6.3(1), Fire Suppression Program Rules.

⁴⁷ 8 CCR § 1507-11-3.6, Fire Suppression Program Rules.

⁴⁸ § 24-33.5-1202(13.3), C.R.S.

Sprinkler fitters must also be registered with the Division.⁴⁹ However, these portions of the Act are not covered under this sunset review.⁵⁰

Job Registration and Review

Before any installation, modification, alteration, or repair of a fire suppression system can commence, a project must meet the following requirements:⁵¹

- It must be registered with the Division;
- It must obtain any required local permits; and
- Its working plans and hydraulic calculations for the job have been reviewed and approved by the Division or a certified local inspector.

The Division reviews plans for jobs prior to their commencement. This does not apply to minor alterations, modifications, repairs, or maintenance work that does not affect the integrity of the system.⁵² If a local fire safety agency requests authority over job registration and plan review, and the Division determines that said local fire safety agency has the capability and qualifications, they can allow the fire safety agency to have oversight. This would satisfy the project's registration requirement at the discretion of the Division.⁵³

Inspections

All installations, modifications, alterations, or repairs of a fire suppression system must be inspected and approved by a certified fire suppression systems inspector.⁵⁴ Contractors are also required to keep complete records of tests and operations of each system, which shall be available for review by inspectors.⁵⁵ Inspections take place until the installation of a system is complete.

The Division certifies inspectors and establishes training requirements.⁵⁶ The Act states that individuals must:⁵⁷

- Be at least 18 years old;
- Not have committed any of the unlawful acts enumerated in the Act; and
- Complete an examination as approved by the Division or demonstrate other such equivalent experience.

⁴⁹ § 24-33.5-1206.7, C.R.S.

⁵⁰ § 24-33.5-1209, C.R.S.

⁵¹ § 24-33.5-1206.2(1), C.R.S.

⁵² *Id.*

⁵³ § 24-33.5-1206.2(1)(b)(II), C.R.S.

⁵⁴ § 24-33.5-1206.4(1), C.R.S.

⁵⁵ § 24-33.5-1206.3(3), C.R.S.

⁵⁶ § 24-33.5-1206.4(3), C.R.S.

⁵⁷ § 24-33.5-1206.4(3), C.R.S.

The International Code Council (ICC) and National Fire Protection Association (NFPA) offer various levels of credentials for the installation and inspection of systems. Applicants can submit credentials from either organization to become certified as an inspector.⁵⁸

Rules of the Program lay out two types of inspectors:

- Inspector II, which are authorized to inspect fire suppression systems;⁵⁹ and
- Inspector III, which are allowed to conduct plan reviews in addition to inspecting fire suppression systems.⁶⁰

An Inspector II classification requires one to have an ICC Fire Inspector II or NFPA Fire Inspector II credential. If a candidate does not have either of these credentials, they must demonstrate that they have the requisite skills and knowledge specified in NFPA 1031.⁶¹ NFPA 1031 is a widely recognized standard that lays out the necessary requirements, knowledge, and skills for individuals who inspect buildings for fire prevention.⁶²

The Inspector III classification requires one to have a combination of the following credentials:⁶³

- ICC Fire Inspector II and ICC Fire Plans Examiner;
- ICC Fire Inspector II and ICC Building Plans Examiner; or
- NFPA Fire Inspector II and NFPA Plans Examiner.

If a candidate does not have any of these credentials, they must demonstrate that they have the requisite skills and knowledge specified in NFPA 1031 for at least five years. This can be demonstrated by work and education experience. Work experience must be specifically in fire prevention, fire protection, code enforcement, or inspection. Education must be an associate degree or above in:⁶⁴

- Fire Science,
- Fire Prevention,
- Fire Protection Engineering, or
- Any other Division approved related major.

⁵⁸ 8 CCR § 1507-101-4.2, Fire Suppression Program Rules.

⁵⁹ 8 CCR § 1507-101-4.2(3)(B), Fire Suppression Program Rules.

⁶⁰ 8 CCR § 1507-101-4.2(3)(C), Fire Suppression Program Rules.

⁶¹ 8 CCR § 1507-101-4.2(3), Fire Suppression Program Rules.

⁶² National Fire Protection Association. *NFPA 1031*. Retrieved October 6, 2025, from <https://www.nfpa.org/codes-and-standards/nfpa-1031-standard-development/1031>

⁶³ 8 CCR § 1507-101-4.2(3), Fire Suppression Program Rules.

⁶⁴ *Id.*

Inspector certifications for both types are valid for three years from issuance.⁶⁵ Inspectors may not be registered contractors, nor may they work directly with or contract with them for any services during this period.⁶⁶

If a county, municipality, or special district has a fire suppression systems enforcement program, they are required to arrange for certified fire suppression systems inspectors on their own accord.⁶⁷ These inspection programs must align with the Division's standards regarding fire suppression systems.⁶⁸ The Division inspects fire suppression systems in public schools, hospitals, and in areas that do not have local authority to do so.⁶⁹ The Division can also provide inspections to localities on a contractual or job-by-job basis.⁷⁰ The locality must reimburse the Division for such services.⁷¹

The number of inspections that take place depends on the size of the project. Projects under 50,000 square feet can have between one to five site visits. Projects between 50,001 and 100,000 square feet have up to 10 site visits. For larger projects, up to five visits take place. Additional visits may be made for each additional 100,000 square feet.⁷²

Discipline

The Division can receive, investigate, and act upon complaints against those persons who violate any of the disciplinary provisions of the Act, or any rules or regulations.⁷³ The Division may also conduct hearings upon charges for discipline, issue subpoenas, compel witness attendance, compel the production of records, administer oaths to persons giving testimony at hearings, and recommend prosecution of persons violating the Act.⁷⁴ Persons who make complaints or provide testimony in disciplinary matters are immune from civil liability in an action arising from being a witness or complainant. This applies only if the person made a reasonable effort to obtain facts and such action was warranted by the facts.⁷⁵

The Division may withhold, deny, suspend, or revoke the registration or certification of any applicant, registered fire suppression contractor, or certified fire safety inspector for any of the following unlawful acts:⁷⁶

⁶⁵ § 24-33.5-1206.4(4), C.R.S.

⁶⁶ 8 CCR § 1507-101-4.2, Fire Suppression Program Rules.

⁶⁷ § 24-33.5-1206.4(2)(a), C.R.S.

⁶⁸ *Id.*

⁶⁹ § 24-33.5-1204.5(1), C.R.S.

⁷⁰ § 24-33.5-1206.4(2)(c), C.R.S.

⁷¹ § 24-33.5-1207.6(2), C.R.S.

⁷² 8 CCR § 1507-11-11.2, Fire Suppression Program Rules.

⁷³ § 24-33.5-1204.5(1)(c), C.R.S.

⁷⁴ § 24-33.5-1204.5(1)(e), C.R.S.

⁷⁵ § 24-33.5-1206.6(5), C.R.S.

⁷⁶ § 24-33.5-1206.6(2), C.R.S.

-
- Committing fraud or material deception while obtaining or renewing a registration;
 - Engaging in conduct that is likely to deceive, defraud, or harm the public in the course of professional services or activities;
 - Professional incompetence as manifested by poor, faulty, or dangerous workmanship;
 - Contracting with or assisting unregistered individuals for services;
 - Performing any services negligently or permitting agents or employees to perform services in a grossly negligent manner, regardless of whether actual damage to the public is established;
 - Willfully receiving compensation, either directly or indirectly, for any services not actually rendered; and
 - Failing to comply with any provision of the Act or rules and regulations.

Persons who act without a registration as a fire suppression contractor commit a petty offense.⁷⁷ A person commits a class 2 misdemeanor if they knowingly and willfully, make any false statement or conceal a material fact with the intent to influence the actions or decisions of any owner or contractor negotiating or contracting for the installation, alteration, or repair of any fire suppression system.⁷⁸

A person may be fined by the Division for violating the registration, installation, inspection, or maintenance sections of the statutes. A first offense can carry a fine of \$100 to \$1,000. A fine of \$1,000 to \$10,000 may be imposed for subsequent offenses.⁷⁹ Fines collected by the Division are credited to the General Fund.⁸⁰

For complaints or investigations that disclose an instance of misconduct that, in the opinion of the Administrator, does not warrant formal action but should not be dismissed, the Division may issue a letter of admonition. A letter of admonition must notify the fire suppression contractor or inspector of their right to request that formal disciplinary proceedings be initiated to settle the matter. The request must be made in writing within 20 days from receipt by the contractor or inspector. If the request for a proceeding is made in a timely manner, the letter of admonition is vacated and formal disciplinary proceedings begin.⁸¹

The Division may also issue Warnings. Warnings are for single, substantiated violations of the rules which, in the opinion of the Administrator, do not rise to the level of a significant violation.⁸²

⁷⁷ § 24-33.5-1206.5(1), C.R.S.

⁷⁸ § 24-33.5-1206.5(2), C.R.S.

⁷⁹ § 24-33.5-1206.6(1), C.R.S.

⁸⁰ § 24-33.5-1206.6(3), C.R.S.

⁸¹ § 24-33.5-1206.6(6), C.R.S.

⁸² 8 CCR § 1507-11-10.3, Fire Suppression Program Rules.

Rules

The Administrator may adopt such rules and regulations as are necessary to implement the Act.⁸³ Rules of the Program are codified in 8 Colorado Code of Regulations (CCR) section 1507-11. These rules cover topics such as:

- Specific registration classifications and their requirements;
- Technical requirements for installations;
- Inspection, testing, and maintenance (ITM);
- Fee schedules;
- Adopted codes;
- Disciplinary procedures; and
- Sprinkler fitter rules.

The rules lay out five types of registrations of contractors:⁸⁴

- Fire Suppression Contractors,
- Residential Fire Suppression Contractor,
- Fire Suppression System Contractor - Underground,
- Fire Suppression System Contractor - Backflow, and
- Fire Suppression System Contractor - Premanufactured.

Fire suppression contractors are those who work in commercial, civil, or residential settings.⁸⁵ Residential contractors are those who only work in residential settings.⁸⁶ Underground contractors specialize in installing underground supply lines from public water lines to systems.⁸⁷ Backflow contractors specialize in installation or ITM of backflow prevention devices that are installed on fire sprinkler systems.⁸⁸ Premanufactured perform work on systems that are installed in factory-built structures.⁸⁹

Other pertinent fire suppression rules include:

- 8 CCR section 1507-30: Enforcement and certification of inspectors for public schools, charter schools and junior colleges;
- 8 CCR section 1507-31: Enforcement and certification of inspectors for state-licensed health facilities;
- 8 CCR section 1507-57: Enforcement and certification of inspectors for limited, state-licensed gaming facilities; and
- 8 CCR section 1507-101: Plan reviews and inspections.

⁸³ § 24-33.5-1204.5(1)(a), C.R.S.

⁸⁴ 8 CCR § 1507-11-3.2(1), Fire Suppression Program Rules.

⁸⁵ 8 CCR § 1507-11-3.2(1), Fire Suppression Program Rules.

⁸⁶ 8 CCR § 1507-11-3.2(2), Fire Suppression Program Rules.

⁸⁷ 8 CCR § 1507-11-3.2(3), Fire Suppression Program Rules.

⁸⁸ 8 CCR § 1507-11-3.2(4), Fire Suppression Program Rules.

⁸⁹ 8 CCR § 1507-11-3.2(5), Fire Suppression Program Rules.

Program Description and Administration

In a sunset review, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) is guided by sunset criteria located in section 24-34-104(6)(b), Colorado Revised Statutes (C.R.S.). The fifth, sixth and seventh sunset criteria question:

Whether the agency operates in the public interest and whether its operation is impeded or enhanced by existing statutes, rules, procedures, and practices and any other circumstances, including budgetary, resource, and personnel matters; and

Whether an analysis of agency operations indicates that the agency or the agency's board or commission performs its statutory duties efficiently and effectively.

In part, COPRRR utilizes this section of the report to evaluate the agency according to these criteria.

The Division of Fire Prevention and Control (Division) houses the Fire Suppression Registration and Inspection Program (Program). The Director of the Division (Administrator) administers the Program.⁹⁰ The Program registers fire suppression system contractors,⁹¹ verifies the conformity of installations to established standards,⁹² and certifies inspectors of fire suppression systems.⁹³

If a county, municipality, or special district has a fire suppression systems enforcement program, they are required to arrange for inspections on their own accord.⁹⁴ Additionally, their inspection programs must match the inspection standards of the Division. The Division inspects fire suppression systems in public schools, hospitals, and in areas that do not have a local authority qualified to do so.⁹⁵ The Division can also provide inspections to localities on a contractual or job-by-job basis upon reimbursement by the locality.⁹⁶

Table 2, below, demonstrates the costs and full-time equivalent (FTE) employees associated with implementing the Program.

⁹⁰ § 24-33.5-1202(1), C.R.S.

⁹¹ § 24-33.5-1206.1, C.R.S.

⁹² § 24-33.5-1206.2, C.R.S.

⁹³ § 24-33.5-1206.4, C.R.S.

⁹⁴ § 24-33.5-1206.4(2)(a), C.R.S.

⁹⁵ § 24-33.5-1204.5(1), C.R.S.

⁹⁶ §§ 24-33.5-1206.4(2)(c) and 24-33.5-1207.6(2), C.R.S.

Table 2
Program Expenses
Fiscal Years 19-20 to 23-24

Fiscal Year	Total Program Expenditure	FTE
19-20	\$136,354.28	1.8
20-21	\$248,003.36	1.9
21-22	\$215,321.57	2.0
22-23	\$95,035.60	2.3
23-24	\$272,945.85	1.4

The Program faced unexpected costs during the COVID-19 pandemic, thus the increase in expenditures in fiscal year 20-21. In fiscal year 22-23, the Division tried a new approach in its budget allocation, hence the lower amount in that year. In fiscal year 22-23, the Division began offering a state fitter examination and started registering a new classification of contractors, which correlated to increased costs in fiscal year 23-24. The Division also returned to its normal allocation procedure in fiscal year 23-24.

Table 3 provides a job description for each of the FTE expressed in Table 2.

Table 3
Job Descriptions
Fiscal Year 23-24

FTE 23-24	Job Description
Fire Marshall VIII - 0.10	Manages the overall program, which includes management of the related budget, administration of the related regulations, and providing administrative oversight of the employees participating in the program.
Fire Marshall V - 0.25	Supervises the day-to-day operations of the Program including ensuring that certifications and registrations are being maintained, and that inspections and plan reviews are being conducted. The position also acts as the point of contact for Program stakeholders.
Fire Marshall IV - 0.25 FTE	Provides training to internal and external stakeholders to drive consistency throughout the state in the application of the Program's adopted codes and standards.
Fire Marshall III - 0.30 FTE	Performs plan reviews for new and renovated systems installed throughout Colorado.
Fire Marshall II - 0.30 FTE	Conducts on-site construction inspections for new and renovated systems installed throughout Colorado
Administrative Assistant III - 0.20 FTE	Conducts the work necessary to register contractors and certify inspectors. Additionally, this position issues invoices and collects fees.

The Division may charge necessary fees to administer the Program.⁹⁷ Tables 4 and 5, below, indicate fee schedules for contractors and for inspectors.

Table 4
Contractor Registration Fees

Fiscal Year	Initial	Renewal
19-20	\$100	\$100
20-21	\$100	\$100
21-22	\$100	\$100
22-23	\$100	\$100
23-24	\$100	\$100

Table 5
Inspector Certification Fees

Fiscal Year	Initial	Renewal
19-20	\$75/\$25	\$75/\$25
20-21	\$75/\$25	\$75/\$25
21-22	\$75/\$25	\$75/\$25
22-23	\$75/\$25	\$75/\$25
23-24	\$75/\$25	\$75/\$25

Fees remained the same for the entire five-year period examined. Monies collected are transmitted to the State Treasurer, who subsequently credits them to the Fire Suppression Cash Fund for use by the Program.⁹⁸ Inspectors pay \$25 if their certification is based on reciprocity of equivalent International Code Council (ICC) or National Fire Protection Association (NFPA) certifications.⁹⁹

Plan Reviews

Before any installation, modification, alteration, or repair of a fire suppression system can commence, a project must meet the following requirements:¹⁰⁰

- It must submit the name of the contractor, their business address, and the address of the installation to the Division;

⁹⁷ § 24-33.5-1204.5(1)(b), C.R.S.

⁹⁸ § 24-33.5-1207.6(1), C.R.S.

⁹⁹ 8 CCR § 1507-101-6.1, Fire Suppression Program Rules.

¹⁰⁰ § 24-33.5-1206.2(1), C.R.S.

- It must obtain any local permits; and
- Its working plans and hydraulic calculations for the job have been reviewed and approved by the Division or a certified local fire suppression inspector.

Plan review fees are calculated based on the total project valuation. Fees for projects with a total project valuation of \$5,000 or less are subject to a flat fee of \$800. For projects with a higher valuation, the base fee is \$800 plus a fee equal to 0.0025 times the total project valuation.¹⁰¹

The table below shows the number of plan reviews that took place in the five fiscal years examined.

Table 6
Plan Reviews

	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Number of Plan Reviews	386	122	174	167	148

Figures in Table 6 illustrate only the plan reviews the Division conducted and do not include the number of inspections and plan reviews conducted by local authorities qualified to do so. Because the COVID-19 pandemic caused halts in construction throughout the state, the number of plan reviews significantly dropped in fiscal year 20-21. Many of the plans submitted were withdrawn as construction projects were uncertain or cancelled. Plan reviews can take anywhere from four to 18 weeks to complete, depending on the size of the project and the number of pending reviews. The Division attempts to complete reviews within 12 weeks. However, this can become constrained by lack of resources. As such, stakeholders have reported processing times of up to 18 weeks, which might cause delays in construction projects.

Registrations

The eleventh and twelfth sunset criteria question whether the scope of practice of the regulated occupation contributes to the optimum use of personnel and whether entry requirements encourage equity, diversity and inclusivity.

In part, COPRRR utilizes this section of the report to evaluate the program according to these criteria.

Any individual or company that employs persons to physically work on a fire protection system needs to be registered as a contractor.¹⁰² Applicants must be the principal of

¹⁰¹ 8 CCR § 1507-11-11.2, Fire Suppression Program Rules.

¹⁰² 8 CCR § 1507-11-3.1, Fire Suppression Program Rules.

the company, which needs to be recorded with the Secretary of State.¹⁰³ In addition, an applicant must carry general liability insurance in the amount of at least \$1 million, which includes coverage related to the installation of fire suppression systems.¹⁰⁴ Registrations expire on December 31 each year regardless of when the registration was issued, unless previously suspended or revoked.¹⁰⁵ Contractors can hire sprinkler fitters to perform services, and to act as a responsible employee on a job site.¹⁰⁶ Sprinkler fitters must also be registered with the Division.¹⁰⁷ However, portions of the Act related to sprinkler fitters are not covered under this sunset review.¹⁰⁸

The rules of the Program contemplate five different registrations of contractors:¹⁰⁹

- Fire Suppression Contractors,
- Residential Fire Suppression Contractor (Residential Contractors),
- Fire Suppression System Contractor - Underground (Underground Contractors),
- Fire Suppression System Contractor - Backflow (Backflow Contractors), and
- Fire Suppression System Contractor - Premanufactured (Premanufactured Contractors).

Fire Suppression Contractors work in commercial, civil, or residential settings.¹¹⁰ The table below shows the number of registrants under this category.

Table 7
Registered Fire Suppression System Contractors

Fiscal Year	New	Renewal	Total
19-20	18	135	153
20-21	18	136	154
21-22	28	123	151
22-23	23	132	155
23-24	31	142	173

The number of registrants remained constant until fiscal year 23-24. It is not clear to the Division why there was a small uptick in registrants that year. This category makes up the third largest number of registrants in the Program in fiscal year 23-24.

¹⁰³ 8 CCR § 1507-11-3.3, Fire Suppression Program Rules.

¹⁰⁴ 8 CCR § 1507-11-3.4, Fire Suppression Program Rules.

¹⁰⁵ 8 CCR § 1507-11-3.5, Fire Suppression Program Rules.

¹⁰⁶ 8 CCR § 1507-11-3.6, Fire Suppression Program Rules.

¹⁰⁷ § 24-33.5-1206.7, C.R.S.

¹⁰⁸ § 24-33.5-1209, C.R.S.

¹⁰⁹ 8 CCR § 1507-11-3.2, Fire Suppression Program Rules.

¹¹⁰ 8 CCR § 1507-11-3.2(1), Fire Suppression Program Rules.

Residential Contractors work only in residential settings.¹¹¹ The registration can be acquired if an applicant demonstrates knowledge by successful completion of residential sprinkler system training, completion of National Fire Protection Association (NFPA) related coursework, or other training approved by the Division. Before installing a pre-engineered residential system, applicants must demonstrate that they are authorized and certified by the system manufacturer.¹¹² The table below indicates the number of residential contractors during the five fiscal years examined.

Table 8
Residential Contractors

Fiscal Year	New	Renewal	Total
19-20	2	10	12
20-21	2	0	2
21-22	1	1	2
22-23	0	0	0
23-24	2	1	3

Unlike the previous category, Residential Contractors can only work in residential settings.¹¹³ Many contractors do not choose this registration as it is more limited, whereas the Fire Suppression Contractor registration allows work in all settings. Residential Contractors made up the smallest number of registrants in the Program during fiscal year 23-24.

Underground Contractors specialize in installing underground supply lines from public water lines to systems.¹¹⁴ Upon initial application or renewal, underground contractors will attest that all personnel performing work on fire suppression systems have received training on and retain copies available for use of the following standards set by the NFPA:¹¹⁵

- NFPA 13,
- NFPA 22, and
- NFPA 24.

Table 9 indicates the number of Underground Contractors.

¹¹¹ 8 CCR § 1507-11-3.2(2), Fire Suppression Program Rules.

¹¹² 8 CCR § 1507-11-3.7, Fire Suppression Program Rules.

¹¹³ 8 CCR § 1507-11-3.2(2), Fire Suppression Program Rules.

¹¹⁴ 8 CCR § 1507-11-3.2(3), Fire Suppression Program Rules.

¹¹⁵ 8 CCR § 1507-11-3.9, Fire Suppression Program Rules.

Table 9
Underground Contractors

Fiscal Year	New	Renewal	Total
19-20	68	207	275
20-21	77	240	317
21-22	81	247	328
22-23	76	246	322
23-24	113	256	369

Underground Contractors are the largest number of fire suppression contractors registered by the Program. There has been an increase in these registrations because the Division has made efforts to notify the public which entities must be registered as Underground Contractors.

Backflow Contractors specialize in installation or the inspection, testing, and maintenance of backflow prevention devices that are installed on fire sprinkler systems.¹¹⁶ They must employ cross-connection control technicians holding valid certification from the American Society of Sanitary Engineering, the American Backflow Prevention Association, or the Association of Boards of Certification.¹¹⁷ Table 10, below, indicates the number of Backflow Contractors in the state.

Table 10
Backflow Contractors

Fiscal Year	New	Renewal	Total
19-20	20	139	159
20-21	29	154	183
21-22	30	147	177
22-23	45	141	186
23-24	51	259	210

The number of Backflow Contractor registrations has risen more than 30 percent from the beginning to the end of the five years examined. The rise can be attributed to a larger need for such contractors, who are especially helpful when it comes to aging infrastructure.

¹¹⁶ 8 CCR § 1507-11-3.2(4), Fire Suppression Program Rules.

¹¹⁷ 8 CCR § 1507-11-3.8, Fire Suppression Program Rules.

In fiscal year 22-23, the Division began registering Premanufactured Contractors, who specialize in the installation of fire suppression systems in factory-built structures.¹¹⁸ These systems are manufactured, assembled, and tested at a centralized manufacturing location prior to being transported as part of a larger building module to the installation site.¹¹⁹ Often, the manufacturer requires individuals to have met their own mandated qualifications. Despite this, the Division saw a need to regulate Premanufactured Contractors due to a rise in complaints related to such systems. Table 11, below, shows the number of registrants since the beginning of this classification.

Table 11
Premanufactured Contractors

Fiscal Year	New	Renewal	Total
22-23	12	Not Applicable	12
23-24	1	7	8

Premanufactured Contractors must employ a “premanufactured system fire suppression special inspector,” who must oversee that the system is fitted according to the system manufacturer’s standards along with Colorado codes, regulations, rules, or standards.¹²⁰ Once the new classification was created, the Division experienced a surge in applications. However, only one new entity applied in the second year. The Division speculates this is because many entities thought they needed to apply for this classification, but realized they did not ultimately need it. The Division notes that more applications have been submitted in years following the review period. However, with the passage of Senate Bill 25-002, this registration will be discontinued. Jurisdiction over premanufactured suppression systems will be transferred to the State Housing Board in the Department of Local Affairs.

Inspections

The Division conducts inspections in public schools, hospitals, and in areas that do not have a local authority to do so.¹²¹ Fees for inspections are based on a project’s valuation. If there is a project valuation of \$5,000 or less, there will be a flat fee of \$800. For projects with a higher valuation, the inspection fee is \$800 plus 0.0025 times the total project valuation.¹²²

¹¹⁸ 8 CCR § 1507-11-3.2(5), Fire Suppression Program Rules.

¹¹⁹ Colorado Division of Fire Prevention and Control. *Premanufactured Suppression Systems*. Retrieved September 10, 2025, from <https://dfpc.colorado.gov/premanufactured-suppression-systems>

¹²⁰ 8 CCR § 1507-11-3.10(1), Fire Suppression Program Rules.

¹²¹ § 24-33.5-1204.5, C.R.S.

¹²² 8 CCR § 1507-11-11.2, Fire Suppression Program Rules.

The Division can also provide inspections for localities on a contractual or job-by-job basis.¹²³ The locality reimburses the Division for such services.¹²⁴ The number of required inspections depends on the size of the project. Projects under 50,000 square feet may require up to five site visits. For projects between 50,001 and 100,000 square feet, up to 10 site visits are conducted. For larger projects, up to five visits take place. Additional visits can be made for each additional 100,000 square feet.¹²⁵ Inspections take place until the installation of a system is complete.

During an inspection, the inspector typically performs a hydrostatic test of the system, conducts operational tests to examine waterflow or system pressure, and examines the control valve's tamper switches. Inspectors also check system coverage to see if there are any blocked sprinkler heads.

Table 12 indicates the number of inspections conducted by the Division for the period examined.

Table 12
Inspections

	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Number of Inspections	237	134	229	234	211

Figures in Table 12 illustrate only the inspections conducted by the Division. They do not include the number of inspections conducted by local authorities that are qualified to do so. The number of inspections dropped in fiscal year 20-21 because the COVID-19 pandemic caused a halt of in person inspections. Otherwise, the number of inspections remained relatively stable each year.

Rules of the Program lay out two types of inspectors:

- Inspector II, which are authorized to inspect fire suppression systems;¹²⁶ and
- Inspector III, which are allowed to conduct plan reviews in addition to inspecting fire suppression systems.¹²⁷

Inspector certifications are valid for three years from issuance.¹²⁸ Inspectors may not be registered contractors, nor may they work directly with or contract with them for

¹²³ § 24-33.5-1206.4(2)(c), C.R.S.

¹²⁴ § 24-33.5-1207.6(2), C.R.S.

¹²⁵ 8 CCR § 1507-11-6.3(1), Fire Suppression Program Rules.

¹²⁶ 8 CCR § 1507-101-4.2(3)(B), Fire Suppression Program Rules.

¹²⁷ 8 CCR § 1507-101-4.2(3)(C), Fire Suppression Program Rules.

¹²⁸ § 24-33.5-1206.4(4), C.R.S.

any services during this period.¹²⁹ The Division is required to approve all inspectors and establish training requirements.¹³⁰ Applicants must:¹³¹

- Be at least 18 years old;
- Not have committed any of the unlawful acts enumerated in the statute; and
- Complete an inspector examination as approved by the Division or demonstrate other such equivalent experience.

The ICC and NFPA offer credentials for inspectors. The Inspector II classification requires one to have an ICC Fire Inspector II or NFPA Fire Inspector II credential. If a candidate does not have either of these credentials, they must demonstrate that they have the requisite skills and knowledge specified in NFPA 1031.¹³² NFPA 1031 is a widely recognized standard that specified necessary requirements, knowledge, and skills for individuals who conduct fire inspections of buildings.¹³³

The table below shows the number of Inspector II Certifications.

Table 13
Inspector II Certifications

Fiscal Year	New	Not Up for Renewal	Renewal	Total
19-20	68	47	15	130
20-21	22	72	12	106
21-22	28	75	22	125
22-23	36	80	23	139
23-24	34	93	17	144

The number of inspectors increased during the COVID-19 pandemic. However, it is not known to the Division why this occurred.

The Inspector III classification requires one to have a combination of the following credentials:¹³⁴

- ICC Fire Inspector II and ICC Fire Plans Examiner;
- ICC Fire Inspector II and ICC Building Plans Examiner; or
- NFPA Fire Inspector II and NFPA Plans Examiner.

¹²⁹ 8 CCR § 1507-101-4.2(2), Fire Suppression Program Rules.

¹³⁰ § 24-33.5-1206.4(3), C.R.S.

¹³¹ § 24-33.5-1206.4(3), C.R.S.

¹³² 8 CCR § 1507-101-4.2(3), Fire Suppression Program Rules.

¹³³ National Fire Protection Association. *NFPA 1031*. Retrieved October 6, 2025, from <https://www.nfpa.org/codes-and-standards/nfpa-1031-standard-development/1031>

¹³⁴ 8 CCR § 1507-101-4.2(3), Fire Suppression Program Rules.

If a candidate does not have any of these combinations, they must demonstrate that they have the requisite skills and knowledge specified in NFPA 1031 for at least five years. This can be demonstrated by work and education experience. Work experience must be specifically in fire prevention, fire protection, code enforcement, or inspection. Education must be an associate degree or above in:¹³⁵

- Fire Science,
- Fire Prevention,
- Fire Protection Engineering, or
- Any other Division approved related major.

The following table describes the number of Inspector III certifications.

Table 14
Inspector III Certifications

Fiscal Year	New	Not Up for Renewal	Renewal	Total
19-20	39	30	53	122
20-21	22	98	45	165
21-22	34	123	29	186
22-23	42	89	68	199
23-24	37	129	47	213

Just like Inspector II certifications, the total number of certifications steadily increased over the five-year review period.

Complaints

The eighth and tenth sunset criteria requires COPRRR to examine whether regulatory oversight can be achieved through a director model, and whether complaint, investigation and disciplinary procedures adequately protect the public and whether final dispositions of complaints are in the public interest or self-serving to the profession or regulated entity.

In part, COPRRR utilizes this section of the report to evaluate the program according to these criteria.

The Division can receive, investigate, and act upon complaints against those who violate any of the disciplinary provisions of the Act, or any rules or regulations.¹³⁶ Persons who

¹³⁵ 8 CCR § 1507-101-4.2(3), Fire Suppression Program Rules.

¹³⁶ § 24-33.5-1204.5(1)(c), C.R.S.

make complaints or provide testimony in disciplinary matters are immune from civil liability in an action arising from being a witness or complainant. This applies only if the person made a reasonable effort to obtain facts and such action was warranted by the facts.¹³⁷

The table below shows the breakdown of all complaints received between fiscal year 19-20 and 23-24.

Table 15
Complaint Information

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Working While Unregistered	0	2	1	4	3
Using Unregistered Fitters	6	2	1	1	13
Working Without a Permit	1	2	2	3	2
Misrepresentation	0	1	0	0	0
Improper Installation	0	2	0	0	2
Unprofessional Practices	2	0	2	5	4
Multiple	3	2	7	2	3
Undetermined	1	1	1	0	1
Total	13	12	14	15	28

All complaints were filed against contractors. There were no complaints lodged against inspectors. “Multiple” refers to complaints that had more than one potential violation. The largest number of complaints were for contractors that used unregistered fitters. Fiscal year 23-24 saw the highest number of such complaints, with 13 in that year alone. The Division noted that local inspection units also reported significantly more complaints that year than they did in prior years.

Disciplinary Activity

The tenth sunset criterion requires COPRRR to examine whether complaint, investigation and disciplinary procedures adequately protect the public and whether final dispositions of complaints are in the public interest or self-serving to the profession or regulated entity.

In part, COPRRR utilizes this section of the report to evaluate the program according to this criterion.

¹³⁷ § 24-33.5-1206.6(5), C.R.S.

Contractors and inspectors may be subject to discipline for:¹³⁸

- Committing fraud or material deception when obtaining or renewing a registration;
- Engaging in conduct that is likely to deceive, defraud, or cause harm to the public in the course of professional services or activities;
- Engaging in professional incompetence as manifested by poor, faulty, or dangerous workmanship;
- Contracting with unregistered individuals for services;
- Performing any services negligently or permitting agents or employees to perform services in a grossly negligent manner;
- Directly or indirectly, willfully receiving compensation for services not actually rendered; and
- Failing to comply with any provision of the Act or its rules.

Those who act without a registration as a fire suppression contractor commit a petty offense.¹³⁹ A person commits a class 2 misdemeanor for knowingly and willfully making a false statement or concealing a material fact with the intent to influence the actions or decisions regarding the installation, alteration, or repair of any fire suppression system.¹⁴⁰

The Division may conduct hearings upon charges for discipline of a contractor or an inspector, issue subpoenas, compel witness attendance, require the production of records, administer oaths to persons giving testimony at hearings, and recommend prosecution of persons violating the Act.¹⁴¹

A person can be fined by the Division for violating the registration, installation, inspection, or maintenance sections of the statutes. Fines collected by the Administrator are credited to the state's General Fund.¹⁴²

A first offense carries may carry a fine of \$100 to \$1,000. Any subsequent offense may incur a fine of \$1,000 to \$10,000.¹⁴³

The Division only imposed one fine, for \$1,000, in fiscal year 22-23. No other fines were imposed throughout the period examined.

The Division is authorized to withhold, deny, suspend, or revoke the registration or certification of any applicant, registered fire suppression contractor, or certified fire safety inspector for violations.¹⁴⁴

¹³⁸ § 24-33.5-1206.6(2), C.R.S.

¹³⁹ § 24-33.5-1206.5(1), C.R.S.

¹⁴⁰ § 24-33.5-1206.5(2), C.R.S.

¹⁴¹ § 24-33.5-1204.5(1)(e), C.R.S.

¹⁴² § 24-33.5-1206.6(3), C.R.S.

¹⁴³ § 24-33.5-1206.5(1), C.R.S.

¹⁴⁴ § 24-33.5-1206.6(2), C.R.S.

For complaints or investigations that disclose an instance of misconduct that, in the opinion of the Administrator, does not warrant formal action but should not be dismissed, the Division may issue a letter of admonition. A letter of admonition must notify the fire suppression contractor or inspector of a right to request that formal disciplinary proceedings be initiated to settle the matter, and that this request can be made within 20 days. If the request for a proceeding is made in a timely manner, the letter of admonition is vacated and formal disciplinary proceedings begin.¹⁴⁵

The Division also issues Warnings to contractors. A Warning may be issued for a single, substantiated, violation. They are delivered by e-mail to the address provided on the certification or registration application. Warnings are less formal in nature and do not rise to the level of a letter of admonition in the opinion of the Administrator.¹⁴⁶

Table 16 breaks down all final agency actions taken for the five fiscal years indicated.

Table 16
Final Agency Actions

Type of Action	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Warnings	4	3	6	12	18
Letter of Admonition	0	0	1	1	0
Suspension	0	1	0	1	0
Revocation	0	1	0	0	1
Total Disciplinary Actions	4	5	7	14	19
Dismiss	9	8	7	1	6
Total Dismissals	9	8	7	1	6

The Division does not collect information regarding the average time to closure calculated from the date the complaint is received until the date of the final agency action.

The majority of actions were Warnings. Many disciplinary actions related to contractors who either performed services without registration or used unregistered sprinkler fitters on jobs. A substantial number of warnings related to contractors failing to provide their registration number on certain documents that are required to be kept.

¹⁴⁵ § 24-33.5-1206.6(6), C.R.S.

¹⁴⁶ 8 CCR § 1507-11-10.3, Fire Suppression Program Rules.

Collateral Consequences - Criminal Convictions

The thirteenth sunset criterion requires COPRRR to examine whether the agency, through its licensing, certification or registration process, imposes any sanctions or disqualifications on applicants based on past criminal history and, if so, whether the sanctions or disqualifications serve public safety or commercial or consumer protection interests.

COPRRR utilizes this section of the report to evaluate the program according to this criterion.

There are no statutory prohibitions based on criminal history attached to this program. However, the rules state that an applicant can be denied if they have been convicted of a crime which reflects upon the integrity of the applicant in operating within the capacity for which they are seeking registration.¹⁴⁷ The Division did not deny any registrations or certifications based on this rule during the five fiscal years examined.

¹⁴⁷ 8 CCR § 1507-11-3.11, Fire Suppression Program Rules.

Analysis and Recommendations

The final sunset criterion questions whether administrative and statutory changes are necessary to improve agency operations to enhance the public interest. The recommendations that follow are offered in consideration of this criterion, in general, and any criteria specifically referenced in those recommendations.

Recommendation 1 — Continue the Fire Suppression Registration and Inspection Program for 11 years, until 2037.

According to the National Fire Protection Association, a fire department responded to a fire every 23 seconds in 2023.¹⁴⁸ Wherever located, fire suppression systems are almost always the first line of defense in fighting a fire. One sprinkler is typically enough to control a fire. From 2017 to 2021, fire sprinklers were effective at controlling a fire in 97 percent of incidents in which they were triggered.¹⁴⁹

Given the lethality of fires, and the effectiveness of fire suppression systems, there is a clear necessity for fire suppression systems to be properly installed by qualified individuals. A system can only protect lives if it is the appropriate system and it is installed correctly. Faulty design or workmanship could lead to sprinklers not being triggered which could lead to increased chance of fire-related injury, or worse, death. In 2023, one home fire-related injury occurred every 52 minutes.¹⁵⁰ A home fire-related death occurred every three hours. The United States had a total of 1,389,000 fires that year, resulting in 3,670 civilian deaths and 13,350 injuries.¹⁵¹

The Colorado Fire Suppression Registration and Inspection Program (Program) ensures fire suppression systems can work properly in the event of a sudden fire. The Program is housed within the Division of Fire Prevention and Control (Division). It safeguards the public by ensuring that fire suppression systems are properly:

- Designed,¹⁵²
- Installed,¹⁵³ and
- Inspected.¹⁵⁴

¹⁴⁸ National Fire Protection Association. *Fire Loss in the United States*. Retrieved October 4, 2025, from <https://www.nfpa.org/education-and-research/research/nfpa-research/fire-statistical-reports/fire-loss-in-the-united-states>

¹⁴⁹ National Fire Protection Association. *U.S. Experience with Sprinklers*. Retrieved September 10, 2025, from <https://content.nfpa.org/-/media/Project/Storefront/Catalog/Files/Research/NFPA-Research/Suppression/ossprinklers.pdf?rev=d6cb0c43b01f424a98bfa45a97c51d66>

¹⁵⁰ National Fire Protection Association. *Fire Loss in the United States*. Retrieved October 4, 2025, from <https://www.nfpa.org/education-and-research/research/nfpa-research/fire-statistical-reports/fire-loss-in-the-united-states>

¹⁵¹ *Id.*

¹⁵² § 24-33.5-1206.2, C.R.S.

¹⁵³ § 24-33.5-1206.3, C.R.S.

¹⁵⁴ § 24-33.5-1206.4, C.R.S.

The Program contemplates five different types of fire suppression contractors. Each different contractor type has targeted, nuanced rules to ensure individuals with the right technical expertise are working on these systems. There are underground contractors, for example, who specialize in installing underground supply lines from public water lines to systems.¹⁵⁵ Compared to other suppression systems, underground supply lines require additional, complex knowledge to properly install, maintain, and inspect. Another example is backflow contractors, who specialize in the installation or inspection, testing, and maintenance of backflow prevention devices that are installed on fire sprinkler systems.¹⁵⁶

The Division also reviews design plans to ensure fire suppression systems are being designed according to proper international, national, or manufacturer codes and gives a record of what installations exist. Insufficient design plans can be rejected and may not be installed until they receive approval by the Division.¹⁵⁷

Additionally, the Administrator is required to approve all inspectors of fire suppression systems in the state and establish training requirements. Inspectors also have the responsibility for reviewing and endorsing design plans of fire suppression systems.¹⁵⁸ The Program ensures that inspectors are also qualified and understand fire suppression standards adopted by the International Code Council or the National Fire Protection Association.¹⁵⁹ Lastly, the Division inspects fire suppression systems in public schools, hospitals, and in areas that do not have a local authority to do so.¹⁶⁰ The Division can also provide inspections to localities on a contractual or on a job-by-job basis.¹⁶¹ Inspections take place up to the end of construction. Local authorities with fire inspection programs must comply with the Division's standards, which helps to ensure that systems around the state are being assessed uniformly.¹⁶²

Although sprinkler systems are the most common, there are also clean agent fire suppression systems. These release a gaseous fire suppressant that is electrically nonconducting and does not leave residue upon evaporation.¹⁶³ Other types of suppression systems are wet and dry chemical systems, which spray chemicals in the form of powder or foam to mitigate fires.¹⁶⁴ Colorado defines a fire suppression system as:¹⁶⁵

¹⁵⁵ 8 CCR § 1507-11-3.2, Fire Suppression Program Rules.

¹⁵⁶ *Id.*

¹⁵⁷ § 24-33.5-1206.2, C.R.S.

¹⁵⁸ § 24-33.5-1206.4, C.R.S.

¹⁵⁹ 8 CCR § 1507-11, Fire Suppression Program Rules.

¹⁶⁰ § 24-33.5-1204.5, C.R.S.

¹⁶¹ § 24-33.5-1206.4(2)(c), C.R.S.

¹⁶² § 24-33.5-1206.2(1)(b)(II), C.R.S.

¹⁶³ National Fire Protection Association. *Clean Agent System Basics*. Retrieved September 10, 2025, from <https://www.nfpa.org/news-blogs-and-articles/blogs/2022/05/06/clean-agent-system-basics>

¹⁶⁴ National Firefighter Corporation. *Wet Chemical Vs. Dry Chemical Fire Suppression Systems*. Retrieved September 10, 2025, from https://www.nationalfirefighter.com/blog/Wet-Chemical-vs-Dry-Chemical-Fire-Suppression-Systems?srltid=AfmBOoo_xEReTDfx3VFogbOqeQOcauKV0KQ3aY21ckaauyQhZP322JWD

¹⁶⁵ § 24-33.5-1202(6), C.R.S.

an assembly of any or all of the following: Piping valves, conduits, dispersal openings, sprinkler heads, orifices, and other similar devices that convey extinguishing agents for the purpose of controlling, confining, or extinguishing fire, with the exception of multipurpose residential fire sprinkler systems in one- and two-family dwellings and townhouses that are part of the potable water supply, pre-engineered range hoods, duct systems, and portable fire extinguishers.

Pre-engineered range hoods, which are placed in kitchens over items like stovetops and ovens, are also considered a mechanism to control fires according to stakeholders. These are not included in the definition above, and the Division does not register contactors who specialize in pre-engineered systems.

In fiscal year 23-24, there were 763 registered fire suppression contractors and 357 certified inspectors. The Division conducted 148 plan reviews, and 211 inspections in that year. A total of 28 complaints were made, and 19 of them resulted in disciplinary action. If systems throughout the state suffer a noticeable decline in the quality of design plans, installations, or inspections, the Division could take a more aggressive stance on administering fines and imposing discipline. Thus, the Program enhances public protection by reviewing plans, inspecting installations and regulating those involved in such activities.

The first sunset criterion asks whether regulation is necessary to protect the public health, safety and welfare. The second criterion asks whether the conditions that led to the initial creation of the program, have changed, and whether other conditions have arisen that would affect the degree of governmental oversight provided.

Extensive training is required to understand how to work with fire suppression systems. The ramifications from improper installation or inspection of fire sprinklers, for example, are obvious. Without the Program, Colorado would have no method of ensuring these life-saving systems are designed, installed, or inspected properly. To ensure the vital protection of buildings, their contents, and occupants, the General Assembly should continue the Program for 11 years, until 2037. This period is appropriate given there are no other statutory recommendations being made in this report.

Recommendation 2 – Make a Technical Amendment to the Act.

The Act contains outdated language that should be revised to reflect current terminology and administrative practices. Therefore, the General Assembly should amend the Act to address the following technical issue:

- Amend the Act to make it gender neutral by replacing terms such as “him”, “her”, “he”, and “she” with gender-neutral terms.

Administrative Recommendation 1 – The Division should take steps to notify the public that they can access information regarding complaints made to the Division.

Regulation by the Program commenced on January 1, 1991. Since the inception of the Program, there has been constant concern regarding recordkeeping, tracking, and publishing data regarding complaints and their final dispositions.

The 1997, 2005, and 2014 sunset reports each noted deficiencies with regards to complaint tracking and publishing. The 2018 sunset report highlighted that a year of data was not available, hence, that report again recommended a shorter window for continuation. It stated that,¹⁶⁶

...because the [Division] continues to have problems keeping track of data necessary to evaluate a regulatory program, the General Assembly should continue the program for only seven years, until 2026.

During the current sunset review, the Division was able to present significantly more information to properly assess and conduct a sunset review. Data regarding licensing information, complaints, and discipline was available for the five fiscal years examined under the scope of the review. Stakeholders have also noted a marked improvement. However, there were suggestions that the Division could now improve on publishing and disseminating information to the public regarding complaint information.

The Division has made marked improvements in this area. Starting in 2025, the Division began posting a Complaint Report on its website. The Complaint Report displays all complaints received by the Division regarding fire suppression contractors, along with their status of disposition.¹⁶⁷ However, given the stakeholder input, it is not clear how much the public knows about this report. The Division also issues a quarterly newsletter on its website. But these do not provide historical information about complaints.

Providing readily available information about the disciplinary activity of any regulatory agency is important for a number of reasons. It creates clear and open communication with the public, which is important to preserving the public's trust. Moreover, openly publishing this information may also help to discourage misconduct. Not only will contractors have a better understanding of the type of conduct that may result in enforcement, but they will also have a better understanding of the consequences of noncompliance.

Making the public aware of the Complaint Report can also help to encourage public participation. For instance, if a consumer has serious concerns about a contractor, one

¹⁶⁶ Colorado Office of Policy, Research, and Regulatory Reform. *2018 Sunset Review: Colorado Fire Suppression Registration and Inspection Program*. Retrieved October 5, 2025, from https://drive.google.com/file/d/1Bb_N8R87o4WUJXinHo8bjLR4sphYZN6s/view

¹⁶⁷ Colorado Division of Fire Prevention and Control. *Reporting or Complaints/Violations*. Retrieved September 10, 2025, from <https://dfpc.colorado.gov/FLSreporting-or-violations>

of their fitters, or an inspector, they are more likely to submit a complaint if they recognize that the Division has taken action against others for similar conduct.

The second sunset criterion asks whether the conditions that led to the initial creation of the program have changed and whether other conditions have arisen that would warrant more, less, or the same degree of governmental oversight. The fourth criterion asks whether agency rules enhance the public interest and are within the scope of legislative intent. The fourteenth criterion asks whether administrative and statutory changes are necessary to improve agency operations to enhance the public interest.

Although the Division has made significant improvements in keeping records of complaints, it should also take steps to notify the public about the availability of such information.