

Common Life Safety Code Deficiencies in Health Care Facilities

John Crowder, Jr., PG, CHFM, CFPS Life Safety Healthcare Consultants, LLC Principal

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Presenter Bio



John L. Crowder, Jr., PG, CHFM, CFPS Principal Life Safety Healthcare Consultants, LLC P.O. Box 8131, Gallatin, TN 37066 615.347.0590 www.lifesafetyhealthcare.com

Mr. Crowder is an active Life Safety Surveyor with the Accreditation Association for Ambulatory Health Care (AAAHC) who possesses over 20 years of experience in the design, construction and management of health care facilities nationwide. Currently, he is the Principal of a Life Safety Consulting firm located in the greater Nashville, Tennessee area. He is also an active member of the National Fire Protection Association (NFPA), the American Society for Health Care Engineers (ASHE) and the American Hospital Association (AHA).

Objectives



- Review top LSC deficiencies based on surveys nationwide by LSHC.
- Determine the most common cause of citations.
- What can you do to be prepared?

How does the 2012 Edition affect your facility?

Quick Points of Interest

- Facilities constructed and/or all permits approved prior to July 5, 2016 are considered to be "EXISTING."
- Facilities constructed and/or all permits approved after July 5, 2016 are considered "NEW."
- All Operating Rooms (OR's) and Procedure Rooms are now considered to be "Wet Areas" <u>UNLESS</u> a Risk Assessment is conducted and approved by the Governing Body noting otherwise. *NFPA 99: 6.3.2.2.8.4* (2012 Edition)
- · Grand-Fathered?

Overview

- On July 5, 2016, the Centers for Medicare and Medicaid Services (CMS) adopted the 2012 Edition of the Health Care Facilities Code (NFPA 99) and the Life Safety Code (NFPA 101).
 CMS will begin surveying for compliance with the 2012 LSC and HCFC on November 1, 2016.
- Life Safety Surveyors are now included on more accrediting surveys than in past years, thus resulting in an increase in citations for items in your Physical Environment of Care.





Common Life Safety Code Deficiencies

Risk Assessments - 7 Steps

Various accrediting agencies may review Risk Assessment procedures differently. Below are 7 steps to ensure compliance with this requirement:

- 1. Identify (the issue)
- 2. Develop arguments that support proposed issue or process.
- 3. Develop arguments that that oppose the proposed issue or process.
- 4. Evaluate both arguments.
- 5. Decide upon or reach a conclusion.
- 6. Document, document, document (the process).
- 7. Monitor and re-assess the conclusion.

Penetrations in Fire-Rated Assemblies

NFPA 101: 8.2.3.2

 Items and devices that pass through fire-rated assemblies such as pipes, conduits, ducts, cables or wires, shall be sealed tight to both sides of the face of the wall with UL approved fire resistant materials.



Fire Rated Door Assembly Inspections

NFPA 101: 7.2.1.15.2

 As of January 1, 2018, all Fire Rated Door Assemblies shall be inspected in accordance with NFPA 80, "Standard for Fire Doors and Other Opening Protectives" on an <u>annual</u> basis.
Documentation shall be kept on-site for review by the local Authorities having Jurisdiction (AHJ's).



Fire Doors & Windows

NFPA 101: 8.3.3, NFPA 80

 Fire Doors and Windows shall be protected by approved, listed, labeled fire door assemblies and fire window assemblies and their accompanying hardware, including all frames, closing devices, anchorage and sills in accordance with the requirements of NFPA 80.



Generator Set Installations

NFPA 110: 5.6.5.6

 All installations shall have a remote manual stop station of a type to prevent inadvertent or unintentional operation located outside the room housing the prime mover, where so installed, or elsewhere on the premises where the prime mover is located external to the weatherproof enclosure and should be appropriately identified.



Generator Testing

NFPA 110: 8.4.2.3

- Monthly load tests are required for generators at 30% load for 30-minutes.
- Annual load test are required for 90 minutes. The test starts at 50% load for 30-minutes and increases to 75% load for 60minutes. Proper documentation shall be maintained recording the test results.

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Generator Set Maintenance

NFPA 110:3

- Routine maintenance of alternate power source generator sets including documentation of date, service type performed, problems identified, corrective measures and testing.
- Weekly Inspections
- Monthly and annual load test
- · Transfer switch exercise monthly



Fuel Quality Test: Diesel Generators Only

NFPA 110: 8.3.8

 A fuel quality test shall be performed annually on the fuel supply for the emergency power generator in accordance with ASTM testing methods.



Sprinkler System Heads and Reserve Supply

NFPA 13: 6.2.9

- A supply of at least six spare sprinklers (never fewer than six) shall be maintained on the premises so that any sprinklers that have operated or been damaged in anyway can be promptly replaced.
- In addition, one sprinkler wrench as specified by the manufacturer shall be provided for each type of sprinkler installed in the system (NFPA 13: 6.2.9.6).



Smoke & Heat Detector Locations

NFPA 70: 2-3.5.1A, NFPA72:10.15

 In spaces served by air-handling systems, detectors shall not be located in a direct airflow nor closer than 3 ft (1 m) from an air supply diffuser, exhaust fan or return air opening.



Air Pressure Relationships O.R.'s & Procedure Rooms

ASHRAE 170 - Table 10.3.1

- Class B and C Operating Rooms shall have a positive air pressure relationship to adjacent areas and have a minimum of 20 air changes per hour (ACH).
- Class A and Procedure Rooms shall have a positive air pressure relationship to adjacent areas and have a minimum of 15 air changes per hour.

Ambulatory Surgery Centers Occupancy Separation

NFPA 101: 20/21.3

 Ambulatory Surgery Centers (ASC's) shall be separated from adjacent areas and occupancies by walls of one-hour fire resistive construction. The walls shall be sealed tight from floor to bottom of deck above and from outside wall to outside wall. Door assemblies located in the walls shall be minimum 45-minute rated assemblies, self closing and positively latching.



Fire & Smoke Dampers

NFPA 80 & NFPA 101

 All Fire and Smoke Dampers shall be tested per NFPA standards in occupancies other than a Hospital upon initial installation, one year after installation and every four years, thereafter.*

*Hospitals shall be tested every six years.

How can you be prepared for your survey?

- Facilities need to be in a constant state of continual survey readiness.
- CMS holds health care facilities solely responsible for compliance with <u>ALL</u> applicable standards and regulations.
- Do not ASSUME that since you have never been cited for an item(s) that you are compliant. There is no such term as "Grand-fathered."
- Have a Mock Survey conducted of your facilities(s) annually for compliance.
- Acquire the services of a competent consultant to provide ongoing training and education to your staff as it relates to the Physical Environment of Care.
- If you are uncertain ASK a professional for guidance.

Thank You!

Thank you for joining us today. We would appreciate the opportunity to provide our vast array of services to ensure your facility is compliant with all LSC regulatory standards and requirements.

Contact us today!

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Life Safety Healthcare Consultants, LLC P.O. Box 8131 Gallatin, Tennessee 37066 615-347-0590 www.lifesafetyhealthcare.com John@lifesafetyhealthcare.com

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Life Safety Code Overview 2017 (Compliance/Life Safety Code/Overview)

	HOME ESUPPORT BLOG	FORUM ACCOUNT *
	LIFE SAFETY CODE: OVERVIEW	(at Anno
25	Updated per 2012 Life Safety Code June 2017	LIFE SAFETY CODE
PROGRESSIVE SUBSIL SUBSIL	Requirements for a Wedicare Certified ASC's physical environment come from three places; the CMS State Operations Manual Appareits L, the CMS adopted edition of the National Tim	Overview
	Protection Association (NFPA) Life Safety Code (LSC) 2012 Safety - and the NFPA Health Care. Facilities Code, 3012 Safety. CMS expects a "complete and comprehensive" assausment of	Initial Approval Documents
	overall LSC compliance with every ASC Medicane survey.	Inspection, Testing, and
LIFE SAFETY CODE OVERVIEW	Medicare-certified ASEs should aspect a more intensive and comprehensive USE survey with more introvied asable and better qualified surveyors. In the past, the USE survey	Maintenance Ongoing Inspection,
PER NFPA LIFE SAFETY CODE AND HEALTH CARE FACILITIES CODE	focused almost exclusively on what was built. The LSC survey includes long standing but seldors checked requirements for the on-going inspection, testing, and maintenance of	Testing, and Maintenance
2012 EDITIONS	NPA required elements.	Ongoing ITM Tools
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	Ufe Safety Code Overview 2017 (per 2012 Edition) Summary of Revised ASC Requirements (USC 2012 Edition) Appendix I: Survey Procedures for Life Safety Code Surveys (6/17)	

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• Directional Flow Video (Compliance/Life Safety Code/Ongoing ITM Tools)



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ide (at a glance

Ongoing ITM Tools (Compliance/Life Safety Code/Ongoing ITM Tools)

A CLICK LINKS BELOW TO DOWNLOAD

- CHICKLIST FORMAT Essential Electrical System Maintenance Guide (checklist) Fire Atarn Testing (checklist) Medical Gas Testing (checklist) Wet Pige Sprinkler Systems Inspection, Testing, and Maintenance (checklist)

- Maintenance (packanu) AT A GLANCE TORMAT B Essential Electrical System Maintenance Guide (at a g B Fre Alarm Testing (at a glance) B HVAC Standards (at a glance) Wet Pipe Synthiae Systems Inspection, Testing, and Maintenance (at a glance)
- ма AL ELECTRICAL SYSTEM
- IONTHLY sets and transfer switches under load and operating temperature very 30 days. A 30 minute exercise period is an absolute minimum, acturer's recommendations should be followed. Testing of generator conditions at least e or the engine manuf Permanently record all available instrument readings during the monthly test During the monthly test, check the following system or systems applicable to your installation:

Bas or Liquid Petroleum Gas System seration of sciencids and regulators indition of all hoses and pipes

- Openson Condition of all too... Fuel quantity Nine Fuel System: Main tank fuel level —Hon of system
- ity pump and controls
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Gregory Tertes, R. Ph, ASC Pharmacist Consultants, Inc.

Friday August 24, 2018 11AM PT/ 2PM ET INFECTION CONTROL RISK ASSESSMENT Phenelle Segal, RN, CIC Infection Control Consulting Services

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Monday July 23, 2018 11AM PT/2PM ET **GI STUDY REVIEW** Vanessa Sindell, MSN, BSN, RN Progressive Surgical Solutions

Monday September 17, 2018 11AM PT/ 2PM ET WORKING EFFECTIVELY WITH YOUR MEDICAL STAFF Alison Galloway, BSN, RN La Peer Surgery Center

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