



## Common Life Safety Code Deficiencies in Health Care Facilities

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## Presenter Bio



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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).

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## 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?

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## 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" **UNLESS** 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

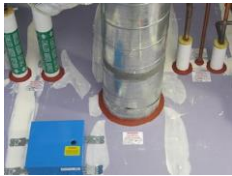
Various accrediting agencies may review Risk Assessment procedures differently. Below are 7 steps to ensure compliance with this requirement:

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 **annual** basis. Documentation shall be kept on-site for review by the local Authorities having Jurisdiction (AHJ's).





## 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

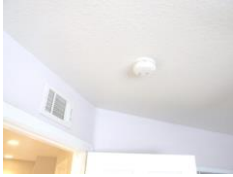
- A supply of at least six spare sprinklers (never fewer than six) shall be maintained on the premises so that any sprinklers that have operated or been damaged in anyway can be promptly replaced.
- In addition, one sprinkler wrench as specified by the manufacturer shall be provided for each type of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

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

## Available on eSupport

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

## Available on eSupport

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

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- Or call us! (855) 777-4272



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Friday June 22, 2018 11AM PT/2PM ET  
**GOT COMPLIANCE? A PHARMACIST'S INSIGHTS FOR SUCCESS**  
 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

## Mark Your Calendars!



Monday July 23, 2018 11AM PT/2PM ET  
**QI 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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