

NOSHE TJC/CMS FLS related codes and standards update

2/22/18

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Fire Marshal CCE



Introduction

- Happy New Year!
- CMS wants everyone in lock step with them
- January 1, 13 and coming in March
 - New standards and deck re-shuffled
 - Reference codes updated- TQ- con ed.
 - 3 CMS SC letters to discuss and clarify
 - 17-38 Fire Doors
 - 07-18 Double leaf smoke barrier door gap
 - 05-38 EXIT discharge to public way
 - Ohio Fire Marshal and 5 year internal pipe inspection



Objectives

- Participants will be able to briefly discuss the changes in TJC effective 1/13/18 as well as the upcoming clarification coming in March.



Objectives

- Those involved in the webinar will be able to explain the intent of the three SC letters 17-38, 07-18 and 05-38 as discussed in the presentation.



Objectives


- Attendees will be able to point surveyors to fully compliant documentation for review as to the requirements of inventory, sub-inventory, procedures, codes, and training/certifications and qualifications.



Standards and standards?

- EC.01.01.01, EP 3 The hospital has a library of information regarding **inspection, testing, and maintenance of its equipment and systems.**

Note: This library includes manuals, procedures provided by manufacturers, technical bulletins, and other information.



KISS for EC.02.03.05 EP1-27,28

- What- Type of activity-IT of fire doors
- Where-location- where are the doors? How many? Types and Sub-Types
- When-Frequency- How often and date
- Why-because-Required by- code reference
- How-did you do this? Procedure
- Who- technician, in house-Training, certification, qualification



Standards and standards?

- Note the code reference update for EP 28
 - Documentation of maintenance, testing, and inspection activities for Standard EC.02.03.05, EPs 1–20, 25 (including fire alarm and fire protection systems) includes the following:
 - **NFPA standard(s) referenced for the activity**



Standards and standards?

- EP 1 Supervisory signal devices per **NFPA 72-2010: Table 14.4.5.**
- EP 2 Waterflow and Tamper switches per **NFPA 72-2010: Table 14.4.5. and NFPA 25-2011: Table 5.1.1.2)**



Standards and standards?

- EP 3 Miscellaneous fire alarm devices per **NFPA 72-2010: Table 14.4.5; 17.14.**



Standards and standards?

- EP 3 Miscellaneous fire alarm devices per NFPA 72-2010: Table 14.4.5; 17.14.
- Duct Smoke Detectors.
 - In addition to the testing required in Table 14.4.2.2(g)(1), duct smoke detectors utilizing sampling tubes shall be tested by verifying the correct pressure differential.



Standards and standards?

- Duct Smoke Detectors.
 - Within the manufacturer's published ranges) between the inlet and exhaust tubes using a method acceptable to the manufacturer
 - Manometer
 - Ensure that the device will properly sample the airstream.
 - Tests in accordance with the manufacturer's published instructions for the device installed.

Standards and standards?

- EP 4 Fire alarm audio-visuals, visuals, door holder magnets and special locking per **NFPA 72-2010: Table 14.4.5.**



Standards and standards?

- EP 5 Off premises notification per **NFPA 72-2010: Table 14.4.5.**
- EP 6 No fire pump per **NFPA 25-2011: 8.3.1; 8.3.2.**
- EP 9 Main Drain tests per **NFPA 25-2011: 13.2.5; 13.3.3.4; Table 13.1.1.2; Table 13.8.1.**



Standards and standards?

- 13.2.5.1
- In systems where the sole water supply is through a **backflow preventer and/or pressure reducing valves**, the main drain test of at least one system downstream of the device shall be conducted on a **quarterly** basis.



Standards and standards?

- EP 10 Fire department connection (Siamese) per **NFPA 25-2011: 13.7; Table 13.1.1.2.**
- EP 11 Fire pump flow per **NFPA 25-2011: 8.3.3.**
- EP 12 Standpipes (read the fine print next slide) per **NFPA 25-2011: 6.3.1; 6.3.2; Table 6.1.1.2.**

Standards and standards?

- 6.3.2 **Hydrostatic Tests.**
- 6.3.2.1
- Hydrostatic tests of not less than 200 psi (13.8 bar) pressure for 2 hours, or at 50 psi (3.4 bar) in excess of the maximum pressure, where maximum pressure is in excess of 150 psi (10.3 bar), shall be conducted every 5 years.



Standards and standards?

- Manual standpipe systems
- Semi-automatic dry standpipe systems
- Piping in the fire department connection.



Standards and standards?

- 6.3.2.1.1
- Manual wet standpipes that are part of a **combined sprinkler/standpipe** system shall **not be required** to be tested in accordance with 6.3.2.1.



Standards and standards?

- 6.3.2.2 *
- Hydrostatic tests shall be conducted in accordance with [6.3.2.1](#) on any system that has been **modified or repaired**.



Standards and standards?

- The hydrostatic test pressure shall be measured at the low elevation point of the individual system or zone being tested.
- 6.3.2.3.1
- The inside standpipe piping shall show no leakage.
- In other words, **DO IT RIGHT!**



Standards and standards?

- EP 13 Kitchen hood fire suppression per **NFPA 96-2011 and operations manual for system.**



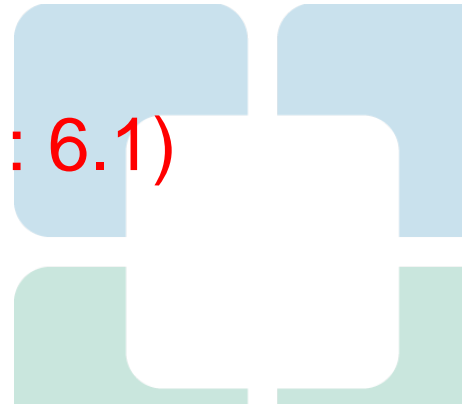
Standards and standards?

- EP 13 Kitchen hood fire suppression
 - LS.02.01.35
 - EP 11
 - **Class K–type portable fire extinguishers** are located within 30 feet of ranges, griddles, broilers.
 - A **placard** is conspicuously placed near the extinguisher stating that the fire protection system should be activated prior to using the fire extinguisher.
 - **NFPA 101-2012: 18/19.3.2.5.1; NFPA 96-2011: 10.10.2; NFPA 10-2010: 5.5.5; 6.6.2)**



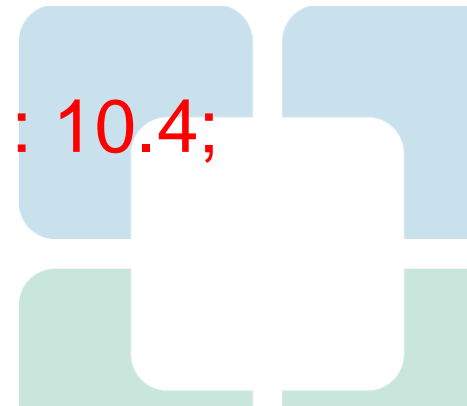
Standards and standards?

- EP 13 Kitchen hood fire suppression
 - LS.02.01.35
 - EP 12
 - Grease-producing cooking devices such as deep fat fryers, ranges, griddles, or broilers have an exhaust hood, an exhaust duct system, and grease removal devices **without mesh filters**.
 - **NFPA 101-2012: 18/19.3.2.5.1; NFPA 96-2011: 6.1)**



Standards and standards?

- EP 13 Kitchen hood fire suppression
 - LS.02.01.35
 - EP 13
 - The automatic fire extinguishing system for grease-producing cooking devices **does the following: deactivates the fuel source, activates the building fire alarm system, and controls the exhaust fans as designed.**
 - NFPA 101-2012: 18/19.3.2.5.1; NFPA 96-2011: 10.4; 10.6.1; 10.6.2; 8.2.3)



Standards and standards?

- EP 14 Non-kitchen hood fire suppression system per **NFPA 13-2011: 4.8.3 and NFPA 12A-2009: Chapter 6.**



Standards and standards?

- EP 14 Non-kitchen hood fire suppression system per NFPA 13-2011: 4.8.3 and NFPA 12A-2009: Chapter 6.
- Clean agent
 - FM 200, ECARO, NOVEC, etc.
 - NFPA 2001, 2012
 - Operations manual.



Standards and standards?

- EP 15 Monthly visual quick check for fire extinguishers per **NFPA 10-2010: 7.2.2; 7.2.4.**
- EP 16 Annual inspection for fire extinguishers per **NFPA 10-2010: 7.1.2; 7.2.2; 7.2.4; 7.3.1.**



Standards and standards?

- EP 17 Occupant hose per NFPA 1962-2008: Chapter 7 and NFPA 25-2011: Chapter 6.
- EP 18 Dampers per NFPA 90A-2012: 5.4.8; NFPA 80-2010: 19.4; NFPA 105-2010: 6.5.



Standards and standards?

- EP 19 Fan shutdown per **NFPA 90A-2012: 6.4.1.**
- EP 20 Horizontal or vertical fire and smoke shutters per **NFPA 80-2010: 5.2.14.3; NFPA 105-2010: 5.2.1; 5.2.2.**



Standards and standards?

- EP 25 Fire doors per NFPA 101-2012:
7.2.1.5.10.1; 7.2.1.5.11; NFPA 80-2010:
4.8.4; 5.2.1; 5.2.3; 5.2.4; 5.2.6; 5.2.7;
6.3.1.7; NFPA 105-2010:



Standards and standards?

- CMS SC Letter 17-38
 - Fire doors
 - Inventory
 - Inspect and test
 - By those with knowledge and understanding
 - FSMP TS IV
 - Was due on 1/1/18- **playing catch up?**



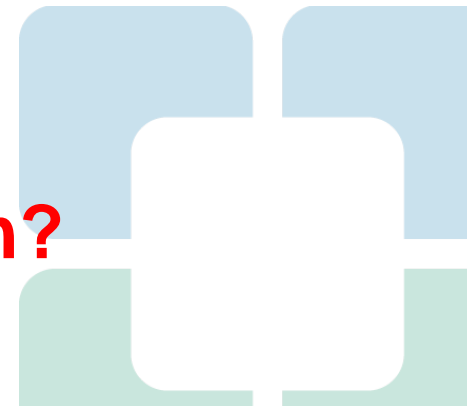
Standards and standards?

- CMS SC Letter 17-38
 - Smoke barrier and corridor doors clarification?
 - Reading **the fine print**
 - Every door needs to work
 - By those with knowledge and understanding
 - FSMP TS IV
 - Was due on 1/1/18- **playing catch up?**
 - **March update will address.....**



Standards and standards?

- CMS SC Letter 07-18
 - Corridor doors clarification?
 - Re-release of old letter
 - Was for NFPA 101 LSC, 2000 but now for 2012.
 - Single double leaf gap in frame
 - Sprinklered? $\frac{1}{2}$ inch vs light tight.
 - Non-sprinklered? $\frac{1}{4}$ inch vs light tight.
 - Door must latch no matter what.
 - This makes good sense- **fire door inspection?**



Standards and standards?

- EP 27 Elevator recall per **NFPA 101-2012: 9.4.3; 9.4.6)** and **ASME 17.2, 2007**



Standards and standards?

- What other activities do you have to perform?
 - Other assets?
 - Foam system
 - Yard Hydrants
 - Fire protection shut off valves
 - Dry Pipe and pre-action sprinkler systems



Standards and standards?

- What other activities do you have to perform?
 - Other assets?
 - Sprinkler heads
 - Gauges
 - EXIT discharge lighting
 - Technically if you have fire and life safety systems and equipment installed, it must be maintained.
 - **If you have it and there is no EP for it, think wild card**

Standards and standards?

- EP 28. Documentation of maintenance, testing, and inspection activities for Standard EC.02.03.05, EPs 1–20, 27 (**my emphasis**) (including fire alarm and fire protection systems) includes the following:



Standards and standards?

- - **Name** of the activity
- **Date** of the activity
- **Inventory** of devices, equipment, or other items (**sub-inventory**)
- Required **frequency** of the activity



Standards and standards?

- - Name and contact information, including affiliation, of the person who performed the activity
 - NFPA standard(s) referenced for the activity
 - Results of the activity



Standards and standards?

- **Note: For additional guidance on documenting activities, see NFPA 25-2011: 4.3; 4.4; NFPA 72-2010: 14.2.1; 14.2.2; 14.2.3; 14.2.4.**
- ***A loaded weapon!***



Standards and standards?

- CMS SC Letter 05-38
 - Emphasis from 2017 K-Tag 271
 - Healthcare
 - Ambulatory Healthcare
 - Business.
- TJC in lock step - **EXIT** discharge path
 - **Hard packed all-weather surface.**



Standards and standards?

- LS.02.01.20, EP 12
 - Exits discharge to the outside at grade level or through an approved exit passageway that is continuous and provides a level walking surface. The exit discharge is a hard-packed, all-weather travel surface that is free from obstructions and terminates at a public way or at an exterior exit discharge. (For full text, refer to NFPA 101-2012: 18/19.2.7; 7.1.7; 7.1.10.1; 7.2.6; 7.7.2)

Standards and standards?

- LS.02.01.20, EP 12
 - Exits discharge to the outside at grade level or through an approved exit passageway that is continuous and provides a level walking surface.



Standards and standards?

- LS.02.01.20, EP 12
 - The **EXIT** discharge is a **hard-packed, all-weather travel surface** that is free from obstructions and terminates at a public way or at an exterior **EXIT** discharge.
 - **NFPA 101-2012: 18/19.2.7; 7.1.7; 7.1.10.1; 7.2.6; 7.7.2)**



Standards and standards?

- LS.01.02.01, EP 4-15
 - TJC surveyor directive regarding a LSC deficiency that cannot be abated before the surveyor leaves the site.
 - There must be a committed ILSM from the facility



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factor**





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