

Common FSES Issues

Incomplete packet:

The FSES packet is incomplete as it does not include all SOD/POC's, 2786 (or construction facts sheet), table 5 (showing the corrections), or a facility layout with the smoke zones identified.

Assessing tags as corrected:

Any K-tag that is out of compliance with the prescriptive requirements must be cited, even if the tag has a current waiver or has a passing score on an FSES. The K-tag must be cited to document that the condition exists and a waiver request or FSES can't be done without showing the deficient practice. A passing FSES score or an approved waiver does not correct the deficient practice, but shows that the facility has been given the opportunity to meet the LSC with an alternative.

Severity Rating:

The scope and severity assigned to this tag was a C, instead of an F, which is not consistent with CMS direction. Any deficient practice that has no actual harm with a potential for more than minimal harm should be cited at the second level even if the tag has a waiver or has a passing score on an FSES.

Occupancy Risk Factors:

Limited Mobility:

The patient mobility is scored as limited mobility. Please confirm that none of the residents in that zone require assistance with transfers and ambulation.

Patient Density:

Please confirm that the patient density will not exceed 30 in all areas of the zones evaluated, including dining and activity rooms.

Staff to Patient Ratio:

The staff to patient ratio is not always assessed using the worst-case scenario.

R-Value Rounding:

The R-value should always be rounded up.

Table 4 - Safety Parameters

Assessing tags as corrected:

Any tag that is found out of compliance should be scored as the condition was found at the time, not with a score that assumes the tag has already been corrected. If the sprinkler system was not properly maintained, it does not get full credit. Use Table 5 shows the corrections.

Determining Number of Stories when several floors are at Grade:
Only one floor can be at grade. NFPA 101A refers back to NFPA 101, 19.1.6.

"For the purpose of 19.1.6, the number of stories shall be counted starting with the primary level of exit discharge and ending with the highest occupiable level. For the purposes of 19.1.6, the primary level of exit discharge of a building shall be the lowest story whose floor is level with or above finished grade on the exterior wall line for 50 percent or more of its perimeter. Building levels below the primary level shall not be counted as a story."

Not all zones are appropriately scored on Table 4, Parameter 1 on the correct floor. One level below grade should be scored as a second floor.

Determining Protected Construction Type:

Ceiling tiles - a fire rating of Class A is only applied to interior finish requirements. This reflects how the tile will perform when flame moves across the surface of the tile. Using a Class A tile with clips will not provide a one hour fire-rated ceiling assembly.

A fire rated ceiling tile assembly refers to the entire ceiling structure, including the tiles, hangers, tracks and how the openings are protected. This may include tenting light fixtures or rated fixtures and in some cases the openings must have dampers. The assembly should follow a specific UL design number to achieve a fire resistance rating regarding how a fire will burn through the ceiling.

Doors to Corridors:

Doors with 20 minute FPR and automatic closures - the closures must be tied to the fire alarm.

Smoke Control:

Mechanically Assisted Systems - this is part of the fire alarm system that provide venting and pressurization and is not commonly found in LTC facilities.

Emergency Movement Routes:

Direct exit means every room has an exit directly to the outside.

Horizontal exits are a zone beyond a minimum two-hour fire wall.

No all-weather surface would be classified as deficient.

Smoke Detection:

Complete smoke detection must be provided by detectors tied to the fire alarm system. Some facilities have detectors in the resident rooms that are not tied to the fire alarm or are tied to a 'secondary' level that does not send the fire alarm into alarm. These should only be credited as corridor only.

Incomplete Sprinklers:

Please note if all hazardous areas including storage rooms exceeding 50 square feet are protected with a one-hour fire resistance rating, including 45 minute rated doors and one hour rated ceilings. The 45 minute doors must be placarded. Solid core wood doors (1 ¾ inch thick) without a placard do not meet this requirement.

Hazardous areas are frequently the cause of FSES failure. A potential course of action for a facility might be to ask for a waiver to keep the current doors/frames and to sprinker the building.

Please note if corridor walls go to the roof deck and/or a smoke tight ceiling.

Please note if the facility has special locking arrangements. If the building is not completely sprinklered, the facility must provide a complete fire alarm system. This requires interconnected smoke detection throughout the building.

If the facility does not have special locking arrangements, please note if all resident rooms and ancillary areas are covered with at least single station smoke detection.

Please note if windows in corridor walls are wired or rated and installed in metal frames.

Please note if the smoke barriers are provided with smoke dampers tied to the fire alarm.

Please verify that the buildings and wings section of ACO correctly reflects the construction type or sprinkler status.

A complete sprinkler system is defined by CMS as all rooms and ancillary areas, including closets, elevator/dumbwaiter/laundry shafts, and walk-in coolers and freezers.

Please be aware that once CMS publishes the sprinkler regulation (estimated date 7/08) and the implementation period is over, waivers and FSES's will not be allowed to be used in lieu of providing a complete sprinkler system.

Table 5 - Alternative Evaluations
Frequently missing

Table 6- Mandatory Requirements
Choose the appropriate zone location given the floor you are evaluating.

Table 8 - Facility Fire Safety Mandatory Requirements
Deficiencies cited shows that not all of the mandatory requirements of Table 8 are met. As a result, the facility does not pass the FSES.