

What Fire/Life Safety Codes & Standards Should a Provider Purchase

- 2000 Life Safety Code (NFPA 101) or Life Safety Code Handbook for 2000 Edition
- 1998 Standard for the Inspection, Testing, and Maintenance of Water Based Fire Suppression Systems (NFPA 25)
- 1999 National Fire Alarm Code (NFPA 72)
- 1999 Standard for Health Care Facilities

CMS Links

- CMS Guidance to State Survey Agency Directors and CMS Regional Offices
 - <http://www.cms.hhs.gov/surveycertificationgeneralinfo/pmsr/list.asp#topofpage>
- State Operations
 - www.cms.hhs.gov/manuals
- Appendix I: Interpretive Guidelines for Life Safety Code Surveys
 - www.cms.hhs.gov/manuals/downloads/Som107ap_i_lsc.pdf

Top Ten Cited Deficiencies

Ten Most Frequently Cited Life Safety Deficiencies in the Nation, March 2008

	Tag	Number of Facilities	Percent of Facilities		KS
1	K018	4,586	29.1%	Corridor Doors	62.1%
2	K029	4,018	25.5%	Hazardous Areas Separated By Construction	62.1%
3	K062	3,601	22.8%	Sprinkler System Maintenance	71.7%
4	K147	3,587	22.7%	Electrical Wiring & Equipment	65.6%
5	K038	2,888	18.3%	Exit Accessible At All Times	36.1%
6	K025	2,658	16.9%	Smoke Barrier Construction	50.6%
7	K056	2,637	16.7%	Sprinkler System Installation	15.0%
8	K050	2,512	15.9%	Fire Drills	36.4%
9	K144	2,400	15.2%	Generators Inspected/Tested	25.4%
10	K067	1,992	12.6%	Ventilating/Heating Equipment	12.7%

Top Ten Cited Deficiencies

Ten Most Frequently Cited Life Safety Deficiencies in Kansas March 2008

	Tag	Percent of Facilities		Nation
1	K062	71.7%	Maintenance/Testing Sprinkler System	#3-22.8%
2	K147	65.6%	Electrical Wiring & Equipment	#4-22.7%
3	K046	64.2%	Emergency Lighting`	NA
4	K018	62.1%	Corridor Doors	#1-29.1%
5	K029	62.1%	Hazardous Area Separation	#2-25.5%
6	K025	50.6%	Smoke Barrier Construction	#6-16.9%
7	K012	38.4%	Building Construction	NA
8	K074	37.3%	Combustible interior furnishings	NA
9	K050	36.4%	Fire Drills	#8-15.9%
10	K038	36.1%	Exit accessibility at all times	#5-16.9%

Top Ten Cited Deficiencies

Ten Most Frequently Cited Life Safety Deficiencies in the Nation, March 2008

	Tag	Number of Facilities	Percent of Facilities		KS	KS Ranking in US
1	K018	4,586	29.1%	Corridor Doors	62.1%	highest
2	K029	4,018	25.5%	Hazardous Areas Separated By Construction	62.1%	highest
3	K062	3,601	22.8%	Sprinkler System Maintenance	71.7%	2 nd highest
4	K147	3,587	22.7%	Electrical Wiring & Equipment	65.6%	3 rd highest
5	K038	2,888	18.3%	Exit Accessible At All Times	36.1%	highest
6	K025	2,658	16.9%	Smoke Barrier Construction	50.6%	highest
7	K056	2,637	16.7%	Sprinkler System Installation	15.0%	20 th highest
8	K050	2,512	15.9%	Fire Drills	36.4%	2 nd highest
9	K144	2,400	15.2%	Generators Inspected/Tested	25.4%	4 th highest
10	K067	1,992	12.6%	Ventilating/Heating Equipment	12.7%	10 th highest

Kansas was higher than the national average in 9 out of 10 of the top ten cited deficiencies in the Nation

Kansas was the highest or 2nd highest in 6 out of 10 of the top ten cited deficiencies in the Nation

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Pending *Life Safety Code* Issues

Use of Power Strips (Flexible Cords)

12/3/2007 Email from James Merrill CMS/Baltimore

Tom, although we have answered questions about extension cords and power strips many times in the past 15 years it has only been recently that the answers were put into policy or guidance. The policy for the use of extension cords and power strips is found in tag F323 Accidents and Supervision which was issued this past August 6, 2007, I have copied the part below. This information is also applicable to Life Safety Code surveys. As you can see that we do not prohibit their use but we do not expect to see them taking the place of adequate electrical systems which is also a regulatory requirement for an adequately designed and constructed facility. If we do see them we expect that they be used safely for the protection of the residents. I suspect that more facilities have seen this information in this guidance than would see life safety code guidance. Lynn Bentley and others from the provider community were involved in the writing of this guidance. Most of it is from applicable Underwriters Laboratory material on relocatable power taps. The guidance is below:

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Use of Power Strips (Flexible Cords)

Extension cords should not be used to take the place of adequate wiring in a facility. If extension cords are used, the cords should be properly secured and not be placed overhead, under carpets or rugs, or anywhere that the cord can cause trips, falls, or overheat. Extension cords should be connected to only one device to prevent overloading of the circuit. The cord itself should be of a size and type for the expected electrical load and made of material that will not fray or cut easily. Electrical cords including extension cords should have proper grounding if required and should not have any grounding devices removed or not used if required.

Power strips may not be used as a substitute for adequate electrical outlets in a facility. Power strips may be used for a computer, monitor, and printer. Power strips are not designed to be used with medical devices in patient care areas. Precautions needed if power strips are used include: installing internal ground fault and over-current protection devices; preventing cords from becoming tripping hazards; and using power strips that are adequate for the number and types of devices used. Overload on any circuit can potentially cause overheating and fire. The use of ground fault circuit interruption (GFCIs) may be required in locations near water sources to prevent electrocution of staff or residents.

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Off-Site Fuel Supplies for Emergency Generators

1. CMS is saying that emergency generators with off-site fuel supplies (piped natural gas) must have an on-site stored fuel supply unless:
 - Provider obtains letter from supplier stating “There is little likelihood of an outage.” or a letter that there is never been an outage and why the fuel supply from the utility is reliable.
2. This is problematic because:
 - Utility companies unlikely to provide such letters for liability reasons
 - CMS’s requirements are inconsistent with Life Safety Code
 - Majority of Nursing Homes do not have life support systems
3. Recommend that provider.
 - Request letter from Utility Company
 - If cannot obtain letter, request 6 month waiver while issue is resolved nationally with CMS.