

# COMPLIANCE NEWS



*" . . . the inability to back up your efforts with required documentation can result in RFIs . . . "*

## Documenting Your EOC

by Ken Gregory - [KGregory@ssr-inc.com](mailto:KGregory@ssr-inc.com)

Is the organization of your Environment of Care (EOC) documents important to your management programs? You bet it is! Too many times hospital personnel have wonderful EOC Management programs in their facility but can't readily prove it with their existing documentation, or the documentation is scattered and/or disorganized to the point that these documents cannot be located in a timely fashion for surveys or inspections and sometimes not at all. No matter how hard you work or how physically effective your programs are, the inability to back up your efforts with required documentation can result in RFIs (requirements for improvement) from The Joint Commission and citations from other AHJs (authorities having jurisdiction). Improving document organization has many advantages, among them: labor savings, improvements that result from enhanced EOC program understanding, easier use of management tools, more successful presentations and EOC reviews, and enhanced readiness for unannounced surveys.

Organization of your documentation is a key component to a successful survey of any type. It is important to understand that surveyors have very limited time to review your facility's EOC documentation, so the more organized your documentation, the better the survey will go. The surveyors will appreciate your efforts to make their job easier. Your organizational efforts demonstrate to the surveyors the emphasis placed on the program's success, and shows confidence in the ability to manage all the facility's EOC commitments. **SSR**

## TJC EC Advisory Bulletin: Life Safety Code Specialist Added to All Hospitals

by Dean Samet, CHSP - [DSamet@ssr-inc.com](mailto:DSamet@ssr-inc.com)

Commencing in 2008, The Joint Commission (TJC) will add a Life Safety Code Specialist surveyor to all hospitals in lieu of those with 200 licensed beds or more, as has been the practice since January 2005. The LSC Specialist surveyor will be joining the TJC survey team, which may consist of at least one physician, one nurse, and an administrator surveyor, depending on the size of the hospital. Also, for hospitals with more than 750,000 sq. ft., TJC will have the LSC Specialist surveyors spend two days evaluating the hospitals for compliance with the NFPA 101 Life Safety Code®, 2000 edition, and select Environment of Care standards, including the electronic Statement of Conditions. **SSR**

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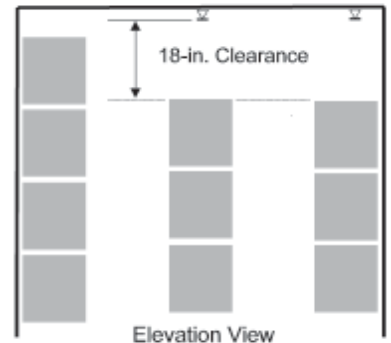
# Compliance News

## Maintaining 18" Clearance to Sprinklers

by Robert Trotter - RTrotter@ssr-inc.com

The Statement of Conditions (SOC) in Part 3: Life Safety Assessment (LSA), assesses your facility's compliance with the requirements of NFPA 101-2000, *Life Safety Code*. Prescribed in SOC Operating Features is a requirement to maintain a clear space  $\geq 18$  inches below standard pendant sprinkler heads. The clearance is measured between the deflector of the sprinkler and the top of storage.

Explanatory material in NFPA 13 states: "The 18-in. dimension is not intended to limit the height of shelving on a wall or shelving against a wall. Where shelving is installed on a wall and is not directly below sprinklers, the shelves, including storage thereon, can extend above the level of a plane located 18-in. below ceiling sprinkler deflectors. Shelving and any storage thereon, directly below the sprinklers, cannot extend above a plane located 18-in. below the ceiling sprinkler deflectors."



The intent of this provision is to minimize obstructions, ensure adequate coverage of the hazard, and allow the discharge pattern of the water to fully develop. *Note: In some jurisdictions the locally adopted fire code may prohibit storage within 2 feet of the ceiling in nonsprinklered areas of buildings.* SSR

## Fire Department Connection (FDC)

by Robert Trotter - RTrotter@ssr-inc.com

Authorities having jurisdiction and fire code officials across America are taking proactive measures to protect the fire department connection (FDC) of fire sprinkler/standpipe systems. Vandalism, an array of homeland security concerns, incidental obstructions from bird nests and trash, and damaged hose threads, as well as malicious or mischievous acts, can restrict or prevent water supplies from reaching sprinklers and standpipes. Moreover, the risks of injury, death, and increased property loss can result from an obstructed or otherwise rendered useless FDC. Fire department connections shall be inspected quarterly in accordance with NFPA 25, *Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems*. The inspection should verify that the fire department connections are visible and accessible, couplings or swivels are not damaged and rotate smoothly, and plugs or caps are in place and undamaged. If fire department connection plugs or caps are not in place, the interior of the connection should be inspected for obstructions. To provide a higher degree of security, there are locking FDC plugs available to protect fire department connections from accidental damage, vandalism, and physical attack. SSR



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## Class K Fire Extinguishers for Cooking Oil Fires

by Robert Trotter - RTrotter@ssr-inc.com



The Statement of Conditions (SOC) and NFPA 101, *Life Safety Code*, both require portable fire extinguishers to protect grease producing cooking devices. Fire extinguishers provided for the protection of cooking appliances that use combustible cooking media (vegetable or animal oils and fats) must be listed and labeled for Class K fires. Existing dry chemical extinguishers (sodium bicarbonate or potassium bicarbonate) without a Class K listing that were installed for the protection of Class K hazards must be replaced with an extinguisher having a Class K listing when the dry chemical extinguishers become due for either a six-year maintenance inspection or hydrostatic test. Remember, a portable fire extinguisher is the secondary means of extinguishment. The approved automatic fire extinguishing system should be activated prior to using a portable fire extinguisher. At a minimum, portable fire extinguishers should be inspected by in-house employees for the following items at approximately 30-day intervals:

1. Location in designated place
2. No obstruction to access or visibility
3. Operating instructions on nameplate legible and facing outward
4. Safety seals and tamper indicators not broken or missing
5. Fullness determined by weighing or "hefting"
6. Examination for obvious physical damage, corrosion, leakage, or clogged nozzle
7. Pressure gauge reading or indicator in the operable range or position.

Annually, portable fire extinguishers should be subjected to a thorough examination by maintenance professionals to check the basic elements of a fire extinguisher. The SOC requires a program for inspection, testing, and maintenance of portable fire extinguishers to ensure cleanliness, operability, and reliability. **SSR**

## TJC EC Advisory Bulletin: e-PFI Compliance Date September 1, 2007

by Dean Samet, CHSP - DSamet@ssr-inc.com



Per the April 2007 periodical, The Joint Commission Perspectives®, TJC has extended the compliance date to September 1, 2007 for converting existing Life Safety Code® deficiencies into electronic Plans for Improvement (e-PFIs) for all accredited organizations. This date supersedes the previous extended date of July 1, 2007 from January 1, 2007. This applies to LSC deficiencies with a "projected completion date" after September 1, 2007. Any PFI item(s) that can be completed before the revised September 1, 2007 deadline need not be entered into the e-PFI; however, you are encouraged to do so. The Joint Commission is working on a solution for importing an organization's existing electronic format(s) into a format that will accurately populate the e-PFI database. TJC intends to provide specific instructions for users to modify an existing Microsoft® Excel spreadsheet so it can be imported into TJC's e-PFI database. All other databases need to first be converted to Microsoft® Excel or manually entered. According to the Perspectives article, TJC currently has no plan to accommodate scanned or PDF files. **SSR**

# Compliance News

## Two-Hour Firewall Penetrations

by Robert Trotter - RTrotter@ssr-inc.com

In accordance with NFPA 101, *Life Safety Code*, and the Statement of Conditions (SOC), every opening in a 2-hour fire barrier shall be protected to limit the spread of fire and restrict the movement of smoke from one side of the barrier to the other. Openings therein shall be protected by 1½ -hour Fire Resistance Rated material. Whether you fill the annular space around the penetrating item with a material that is capable of maintaining the fire resistance rating of the barrier [fire caulk], use an approved device designed for the specific purpose, or install a sleeve, the applicable provisions of the LSC should be reviewed with expert consultation to ensure compliance. While every penetration is of critical importance, such penetrations in those facilities not protected throughout by an approved automatic sprinkler system should demand the greatest attention to detail. **SSR**



Example: 2-hour firewall penetration

## Publications & Seminars

### **Look for these articles in publication**

"Prescription for Power - Advice on EP system reliability," *Health Facilities Management*, May 2007

### **Seminars in 2007**

May 31	Schneider Electric/Square D Healthcare Facilities Technical Conference, Philadelphia, PA, "2007 Environment of Care Survey Focus"
June 7	Mississippi Society for Healthcare Engineers Annual Vendor Show, Bay St. Louis, MS, "A-Z of BMP" and "Life Safety Code"
June 8	Georgia Society for Hospital Engineers Annual Meeting, Calloway, GA, "The Joint Commission EOC and e-SOC Update"
July 8	Shriners' Hospitals Facility Directors' Annual Meeting, New Orleans, LA, "Sentinel Event Alert 37"
July 10	ASHE Annual Meeting, New Orleans, LA, "Planning for Power Failures" and "Selling the Maintenance Mission"
August 1-3	Kentucky Society of Healthcare Engineers Annual Conference, Bowling Green, KY, "Electrical Systems and Medical Gas Systems"
September 19	South Dakota Association of Healthcare Organizations 81st Annual Convention, Sioux Falls, SD, "A-Z of BMP"
October 3	NEHES Fall Conference, Portland, ME, "Environment of Care Survey Focus 2007"
November 7-9	Midwest Healthcare Engineering Conference, Indianapolis, IN, "Planning for Power Failures," "2007 Environment of Care Survey Focus," "The Value of a Post Occupancy Evaluation," and "Integration of Communications and Technology Systems in the Planning, Design and Construction of Healthcare Facilities"



## Compliance News

A Newsletter Dedicated to Accreditation, Regulatory Compliance and Facility Management Issues for Healthcare Executives and Facility Managers

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