



# Changes to the Life Safety Code Survey Process

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Bureau of Community and Health Systems  
State of Michigan – LARA

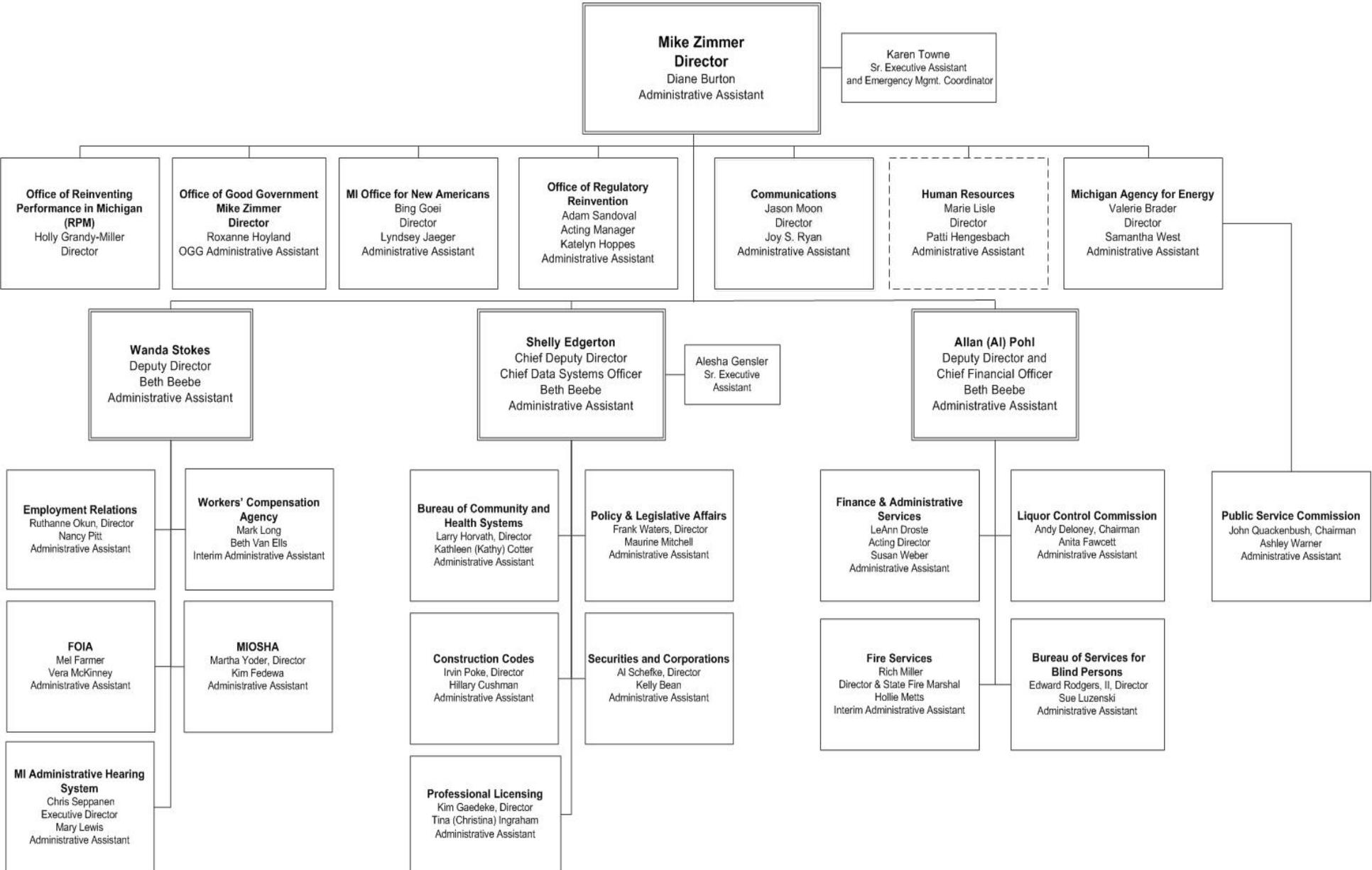
# Bureau Changes since January 1, 2015

Bureau of Health Care Services split

- Bureau of Community & Health Systems
- Bureau of Professional Licensing

**DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS**  
**611 W. Ottawa, Lansing, MI 48933 - PO Box 30004, Lansing, MI 48909**  
**(517) 373-1820**

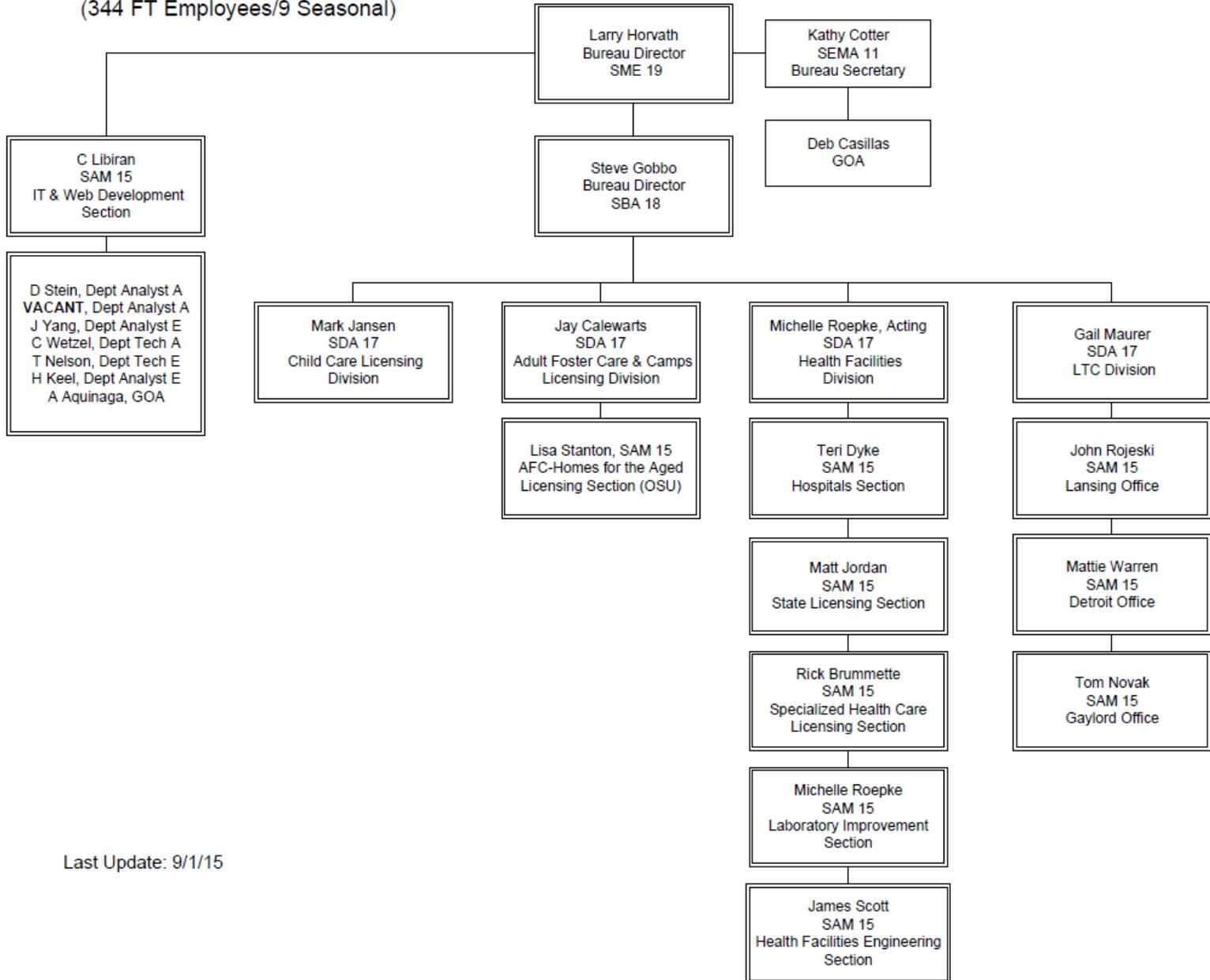
08/17/2015



# Bureau of Community and Health Systems Divisions

- ▶ Adult Foster Care and Camps
  - ▶ Child Care
  - ▶ Health Facilities
  - ▶ Long Term Care
- 

**Bureau of Community and Health Systems**  
 (344 FT Employees/9 Seasonal)



Last Update: 9/1/15

# LSC Changes since 10/1/2014

4 LSC Surveyors to LTC

4 LSC Surveyors to HFES

3 LSC Surveyors July – September

New Hire – Sept 28

# Advantages

- ▶ Develop expertise in LSC for LTC
  - ▶ More consistent citations
  - ▶ More consistent language in reports
  - ▶ Long term familiarity with facilities
- 

# Life Safety Code Surveyors

- ▶ Don Christensen
  - ▶ Ed Hale
  - ▶ John Hanes
  - ▶ Jeffery Tody
- 

# Health Facilities Engineering Section



# LSC Survey Process

- ▶ Annual Survey
  - ▶ Documentation of Survey (Statement of Deficiencies – 2567)
  - ▶ Plan of Correction
  - ▶ Approval of Plan of Correction
  - ▶ Revisit
- 

# LSC Annual Survey Goal

- ▶ Survey with Health Team
  - ▶ Survey within 7 days of Health Team
  - ▶ Complete LSC Survey
- 

# Statement of Deficiencies

- ▶ Accurately Describe Findings
  - ▶ Be Consistent Among Surveyors
  - ▶ Be Timely in Completion
- 

# Plan of Correction

- ▶ Delivered by email
  - ▶ Returned on 2567 Form
  - ▶ Email Identifier
  - ▶ Required Fields to Be Completed
- 

# POC Critical Items

- ▶ Use of correct form
  - ▶ Admin signature & date
  - ▶ Correction date for each citation
  - ▶ Date POC emailed to LARA
  - ▶ Documentation of corrective action
- 

# Revisits

- ▶ After Accepted Compliance Date
  - ▶ Before DPNA Goes Into Effect
- 

# New vs. Existing S & C Letter 03-21

- ▶ The effective date of this regulation is March 11, 2003. Buildings that have a plan approval and are constructed after March 11, 2003 will be considered as new buildings.

# S & C Letter

## 12-21 LSC

- ▶ March 9, 2012
- ▶ Categorical waivers
- ▶ Now allowed under State Fire Safety Rules

# Construction Inspections

- ▶ 50%
- ▶ 100%



# Most Cited K-Tags in an LSC Survey



John Hanes  
Fire Safety Inspector  
State of Michigan – LARA  
Health Facilities Engineering Section

# Objectives

**Requirements For Participation In Medicare/Medicaid**

**The Life Safety Code Survey**

**Most Common Citations**



# Legislation that Affects Facilities Participating in Medicare/Medicaid

42 CFR Subpart 483.70(a)

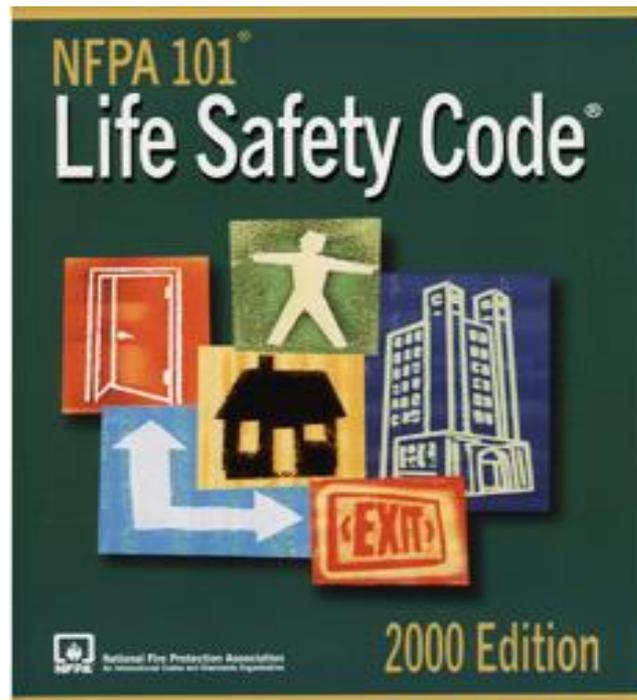
“Life Safety From Fire”

Requires that the facility must meet the applicable provisions of the 2000 edition of the Life Safety Code of the National Fire Protection Association (NFPA 101).



# Life Safety Code

The LSC is a set of fire protection requirements that, if met, provide reasonable degree of safety from fire



# Life Safety Code Survey

Covers construction, protection, and operational features that provide safety to life from fire, smoke and panic.



# Reporting Citations

CMS reports the citations in order of frequency and locations

## Citation Frequency Report

### Selection Criteria

**Begin Year:** 2015  
**End Year:** 2015  
**Display Options:** Display top 25 tags  
**Provider and Supplier Type(s):** Dually Certified SNF/NFs - Medicare and Medicaid  
**State:** Michigan  
**Deficiency Tags:** Any K Codes  
**Survey Focus:** Life Safety  
**Survey Type:** Traditional

Year Type:  Year:  Quarter:

State	Tag #	Tag Description	# Citations	% Providers Cited	% Surveys Cited
		<b>Totals represent the # of providers and surveys that meet the selection criteria specified above.</b>		Michigan Active Providers=330	Total Number of Surveys=161
	<a href="#">K0147</a>	ELECTRICAL WIRING AND EQUIPMENT	100	28.5%	62.1%
	<a href="#">K0062</a>	SPRINKLER SYSTEM MAINTENANCE	100	29.1%	62.1%
	<a href="#">K0029</a>	HAZARDOUS AREAS - SEPARATION	97	28.2%	60.2%
	<a href="#">K0026</a>	SMOKE PARTITION CONSTRUCTION	54	16.1%	33.5%
	<a href="#">K0051</a>	FIRE ALARM SYSTEM	51	15.2%	31.7%
	<a href="#">K0018</a>	CORRIDOR DOORS	41	12.4%	25.5%
	<a href="#">K0038</a>	EXIT ACCESS	34	10.0%	21.1%
	<a href="#">K0072</a>	FURNISHING AND DECORATIONS	33	10.0%	20.5%
	<a href="#">K0064</a>	PORTABLE FIRE EXTINGUISHERS	29	8.5%	18.0%
	<a href="#">K0144</a>	GENERATORS INSPECTED/TESTED	28	8.5%	17.4%
	<a href="#">K0069</a>	COOKING EQUIPMENT	24	7.0%	14.9%
	<a href="#">K0052</a>	TESTING OF FIRE ALARM	20	6.1%	12.4%
	<a href="#">K0076</a>	MEDICAL GAS SYSTEM	19	5.8%	11.8%
	<a href="#">K0054</a>	SMOKE DETECTOR MAINTENANCE	18	5.5%	11.2%
	<a href="#">K0050</a>	FIRE DRILLS	17	4.5%	10.6%
	<a href="#">K0056</a>	AUTOMATIC SPRINKLER SYSTEM	14	4.2%	8.7%
	<a href="#">K0027</a>	DOORS IN SMOKE PARTITIONS	14	4.2%	8.7%
	<a href="#">K0046</a>	EMERGENCY LIGHTING	13	3.9%	8.1%
	<a href="#">K0146</a>	ALTERNATE SOURCE OF POWER	12	3.0%	7.5%
	<a href="#">K0022</a>	ENCLOSURE DOORS	12	3.6%	7.5%

# Life Safety Code Citations



A “K” Tag is a citation observed during the LSC Survey

That refers to sections of the LSC as well as other NFPA Publications

Section 19.3.5.2

Section 9.7

NFPA 13

# Most Common Citations

The requirement at 42 CFR Subpart 483.70(a) is NOT MET as evidenced by:



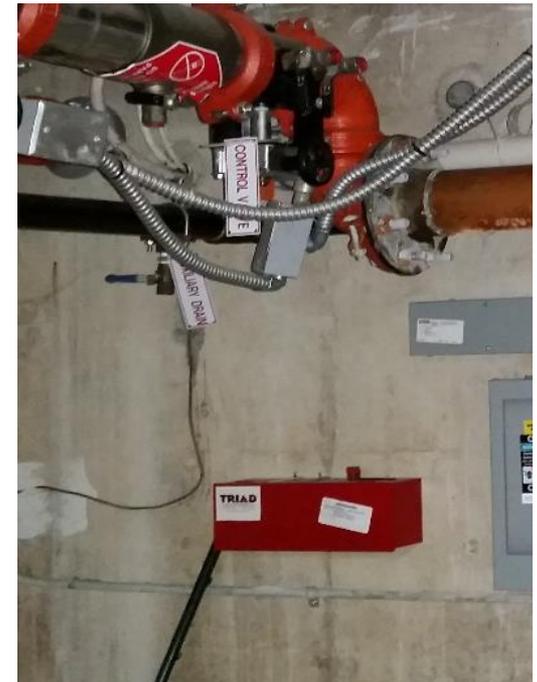
# K147 ELECTRICAL WIRING AND EQUIPMENT

Electrical wiring and equipment shall be in accordance with National Electrical Code. 9-1.2 (NFPA 99) 18.9.1, 19.9.1



# K62 SPRINKLER SYSTEM MAINTENANCE

Automatic sprinkler systems are continuously maintained in reliable operating condition and are inspected and tested periodically. 18.7.6, 19.7.6, 4.6.12, NFPA 13, NFPA 25, 9.7.5



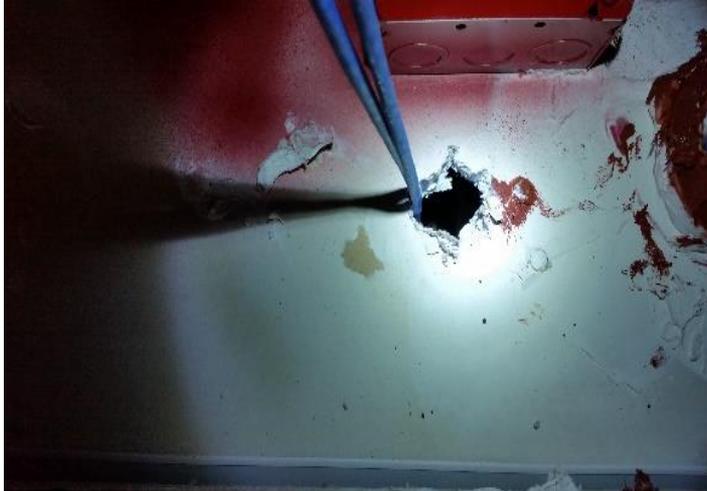
# K29 HAZARDOUS AREAS – SEPARATION

One hour fire rated construction (with  $\frac{3}{4}$  hour fire-rated doors) or an approved automatic fire extinguishing system in accordance with 8.4.1 and/or 19.3.5.4 protects hazardous areas. When the approved automatic fire extinguishing system option is used, the areas shall be separated from other spaces by smoke resisting partitions and doors. Doors shall be self-closing and non-rated or field-applied protective plates that do not exceed 48 inches from the bottom of the door are permitted. 19.3.2.1



# K25 SMOKE BARRIER CONSTRUCTION

Smoke barriers shall be constructed to provide at least a one half hour (existing) one hour (new) fire resistance rating and constructed in accordance with 8.3. Smoke barriers shall be permitted to terminate at an atrium wall. Windows shall be protected by fire-rated glazing or by wired glass panels in approved frames 8.3, 19.3.7.3, 18.3.7.3, 19.3.7.5, 18.3.7.5



# K51 FIRE ALARM SYSTEM

A fire alarm system is installed with systems and components approved for the purpose in accordance with NFPA 70, National Electric Code and NFPA 72, National Fire Alarm Code to provide effective warning of fire in any part of the building. Fire alarm system wiring or other transmission paths are monitored for integrity. Initiation of the fire alarm system is by manual means and by any required sprinkler system alarm, detection device, or detection system. Manual alarm boxes are provided in the path of egress near each required exit. Manual alarm boxes in patient sleeping areas shall not be required at exits if manual alarm boxes are located at all nurse's stations. Occupant notification is provided by audible and visual signals. In critical care areas, visual alarms are sufficient. The fire alarm system transmits the alarm automatically to notify emergency forces in the event of fire. The fire alarm automatically activates required control functions. System records are maintained and readily available. 18.3.4, 19.3.4, 9.6



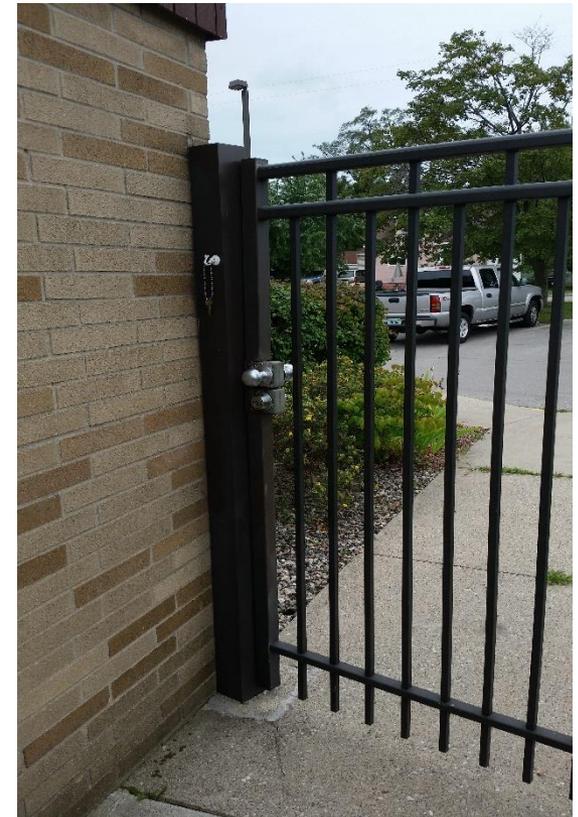
# K18 CORRIDOR DOORS

Doors protecting corridor openings in other than required enclosures of vertical openings, exits, of hazardous areas shall be substantial doors, such as those constructed of 1 ¾ inch solid-bonded core wood, or capable of resisting fire for at least 20 minutes. Clearance between bottom of door and floor covering is not exceeding 1 inch. Doors in fully sprinklered smoke compartments are only required to resist the passage of smoke. There is no impediment to the closing of the doors. Hold open devices that release when the door is pushed or pulled are permitted. Doors shall be provided with a means suitable for keeping the door closed. Dutch doors meeting 19.3.6.3.6 are permitted. Door frames shall be labeled and made of steel or other materials in compliance with 8.2.3.2.1. Roller latches are prohibited by CMS regulations in all health care facilities. 19.3.6.3, 18.3.6.3



# K38 EXIT ACCESS

Exit access is so arranged that exits are readily accessible at all times in accordance with 7.1, 18.2.1, 19.2.1



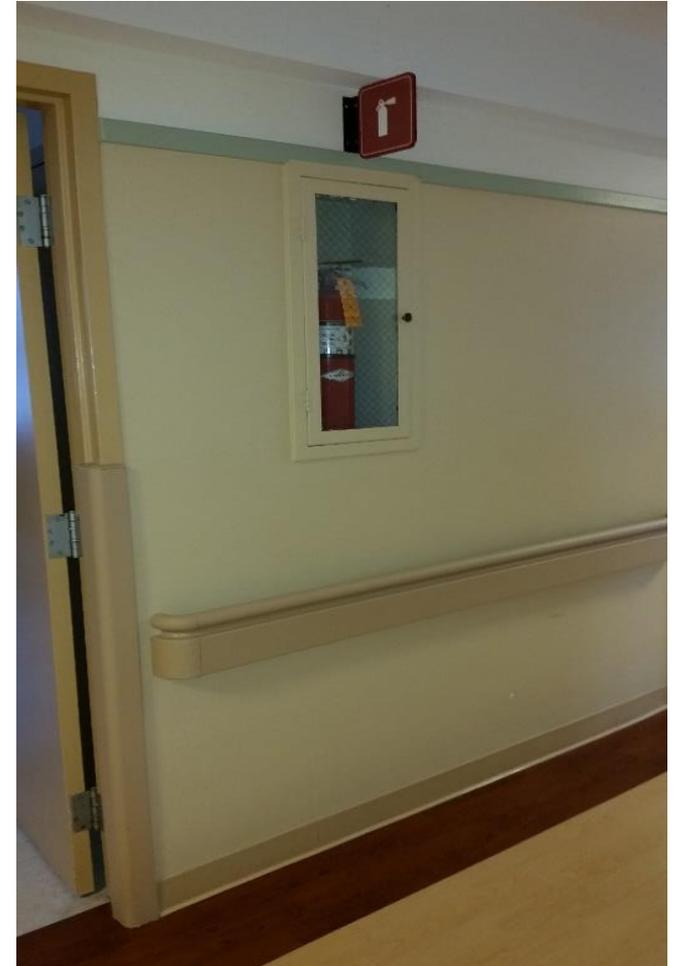
# K72 FURNISHING AND DECORATIONS

Means of egress shall be continuously maintained free of all obstructions or impediments to full instant use in the case of fire or other emergency. No furnishings, decorations, or other objects shall obstruct exits, access thereto, egress there from, or visibility thereof shall be in accordance with 7.1.10, 18.2.1, 19.2.1



# K64 PORTABLE FIRE EXTINGUISHERS

Portable fire extinguishers shall be installed, inspected, and maintained in all health care occupancies in accordance with 9.7.4.1, NFPA 10. 18.3.5.6, 19.3.5.6



# K144 GENERATORS INSPECTED/TESTED

Generators inspected weekly and exercised under load for 30 minutes per month and shall be in accordance with NFPA 99 and NFPA 110. 3-4.4.1 and 8-4.2 (NFPA 99), Chapter 6 (NFPA 110)

2021 GENERATOR LOG												FACILITY: <i>CSC</i>		
Start Time	Stop Time	Elapsed Run Time	Oil Pressure	Oil Temperature	Fuel Oil Pressure	Water Temp.	Battery Amperes	Phase 1		Phase 2		Phase 3		Frequency
								Volts	Amperes	Volts	Amperes	Volts	Amperes	
3265	3270		60	N/A	N/A	160	14	460	-	460	-	460	-	60
3270	3270		60	N/A	N/A	160	14	460	-	460	-	460	-	60
3276	3282		60	N/A	N/A	160	14	460	-	460	-	460	-	60
3282	3288	30	60	N/A	N/A	160	14	460	35	460	38	460	30	60
3288	3293		60	N/A	N/A	160	14	460	-	460	-	460	-	60
3293	3317	1.45												
3317	3323		60	N/A	N/A	160	14	460	30	460	30	460	35	60
3360	3367	30	60	N/A	N/A	160	14	460	-	460	-	460	-	60
3347	3353		62	N/A	N/A	160	14	460	-	460	-	460	-	60
3353	3358		62	N/A	N/A	160	14	460	-	460	-	460	-	60
3358	3358.5	30	62	N/A	N/A	160	14	460	-	460	-	460	-	60
3384	3389		62	N/A	N/A	160	14	460	30	460	30	460	35	60
3389	3392		60	N/A	N/A	160	14	460	-	460	-	460	-	60



# K69 COOKING EQUIPMENT

Cooking facilities shall be protected in accordance with 9.2.3.18.3.2.6, 19.3.2.6, NFPA 96



# K52 TESTING OF FIRE ALARM

A fire alarm system required for life safety shall be tested, and maintained in accordance with NFPA 70 National Electrical Code and NFPA 72 National Fire Alarm Code and records kept readily available. The system shall have an approved maintenance and testing program complying with applicable requirements of NFPA 70 and 72. 9.6.1.4, 9.6.1.7



**FIRE ALARM AND EMERGENCY COMMUNICATION SYSTEM INSPECTION AND TESTING FORM**

*To be completed by the system inspector or tester at the time of the inspection or test.  
It shall be permitted to modify this form as needed to provide a more complete and/or clear record.  
Insert N/A in all unused lines.  
Attach additional sheets, data, or calculations as necessary to provide a complete record.*

Date of this inspection or test: 12/22/2010 Time of inspection or test: 8:00 AM

**1. PROPERTY INFORMATION**

Name of property: Main Street Towers  
Address: 12345 Main Street, Pleasantville, NY 01111  
Description of property: 40-story high-rise building with an adjacent 1-story parking structure  
Occupancy type: B1  
Name of property representative: Mary Morris, Property Manager, Mary's Management Company  
Address: 12345 Main Street, Pleasantville, NY 01111  
Phone: 222/222-2222 Fax: 333/333-3333 E-mail: mm@mmc.com  
Authority having jurisdiction over this property: Inspector Jack Jones, Pleasantville Fire Department  
Phone: 444/444-4444 Fax: 555/555-5555 E-mail: jackjones@pfd.org

**2. INSTALLATION, SERVICE, AND TESTING CONTRACTOR INFORMATION**

Service and/or testing organization for this equipment: Fred's Fine Fire Alarm Systems  
Address: 789 Broad Street, Pleasantville, NY 01113  
Phone: 888/888-8888 Fax: 999/999-9999 E-mail: fredfriendly@ffas.com  
Service technician or tester: Fred Friendly  
Qualifications of technician or tester: NICET IV No 888888  
A contract for test and inspection in accordance with NFPA standards is in effect as of: 6/11/2010  
The contract expires: 6/11/2011 Contract number: 45678 Frequency of tests and inspections: Quarterly  
Monitoring organization for this equipment: Manny's Monitoring  
Address: 899 First Street, Pleasantville, NY 01114  
Phone: 777/777-7777 Fax: 777/777-7777 E-mail: manny@mannys.com  
Entity to which alarms are retransmitted: Pleasantville Fire Department Phone: 444/444-4444

**3. TYPE OF SYSTEM OR SERVICE**

Fire alarm system (nonvoice)  
 Fire alarm with in-building fire emergency voice alarm communication system (EVACS)  
 Mass notification system (MNS)  
 Combination system, with the following components:  
 Fire alarm  EVACS  MNS  Two-way, in-building, emergency communication system  
 Other (specify): N/A

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# K76 MEDICAL GAS SYSTEM

Medical gas storage and administration areas shall be protected in accordance with NFPA 99, Standard for Health Care Facilities.

Oxygen storage locations of greater than 3,000 cu. ft. are enclosed by a one-hour separation. Locations for supply systems of greater than 3,000 cu. ft. are vented to the outside. 4-3.1.1.2 (NFPA 99), 8.3.1.11.1 (NFPA 99), 18.3.2.4, 19.3.2.4



# K54 SMOKE DETECTOR MAINTENANCE

All required smoke detectors, including those activating door hold-open devices, are approved, maintained, inspected and tested in accordance with the manufacturer's specifications.  
9.6.1.3



# K50 FIRE DRILLS

Fire drills include the transmission of a fire alarm signal and simulation of emergency fire conditions. Fire drills are held at unexpected times under varying conditions, at least quarterly on each shift. The staff is familiar with procedures and is aware that drills are part of established routine. Responsibility for planning and conducting drills is assigned only to competent persons who are qualified to exercise leadership. Where drills are conducted between 9:00 PM and 6:00 AM a coded announcement may be used instead of audible alarms. 18.7.1.2, 19.7.1.2

Fire Drill Record												
Shift	Jan.	Feb.	March	April	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
7-3												
3-11												
11-7												



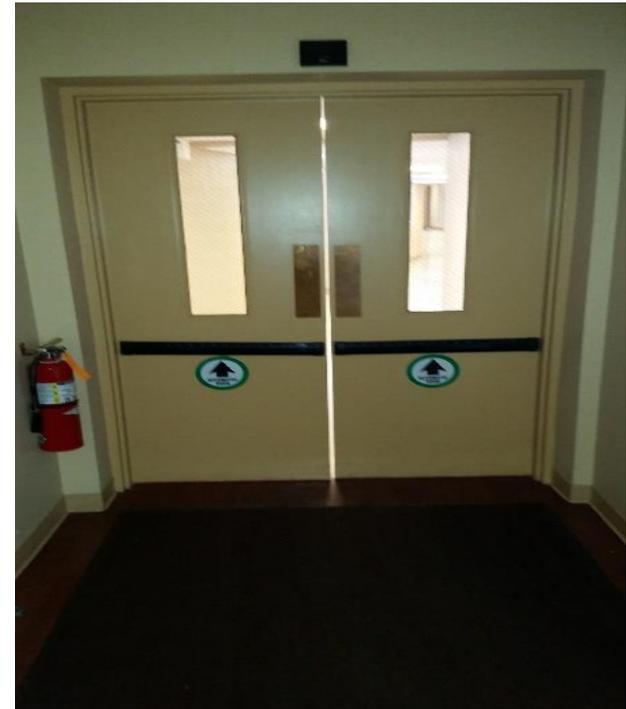
# K56 AUTOMATIC SPRINKLER SYSTEM

Where required by section 19.1.6, Health care facilities shall be protected throughout by an approved, supervised automatic sprinkler system in accordance with section 9.7. Required sprinkler systems are equipped with water flow and tamper switches which are electrically interconnected to the building fire alarm. In Type I and II construction, alternative protection measures shall be permitted to be substituted for sprinkler protection in specific areas where State or local regulations prohibit sprinklers. 19.3.5, 19.3.5.1, NFPA 13



# K27 DOORS IN SMOKE BARRIERS

Doors in smoke barriers have at least a 20 minute fire protection rating or are at least 1¾ inch thick solid bonded core wood. Non-rated protective plates that do not exceed 48 inches from the bottom of the door are permitted. Horizontal sliding doors comply with 7.2.1.14. Doors shall be self-closing or automatic-closing in accordance with 19.2.2.2.6. Swinging doors are not required to swing with egress and positive latching is not required. 19.3.7.5, 19.3.7.6, 19.3.7.7



# K46 EMERGENCY LIGHTING

Emergency lighting of at least 1½ hour duration is provided in accordance with 7.9. 18.2.9.1, 19.2.9.1.



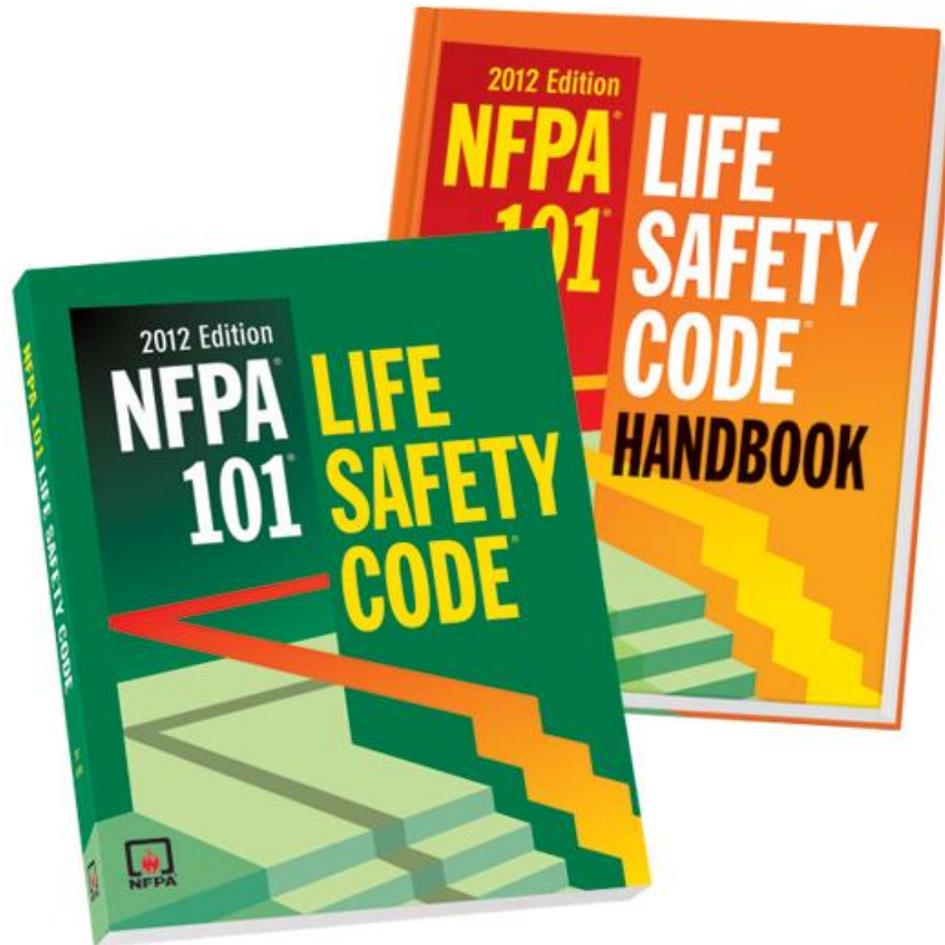


# Upcoming Changes to the Life Safety Code

With the adoption of the 2012 NFPA 101 by



# 2012 Life Safety Code Change Highlights



# Corridor Projections (18/19.2.3.4)

Non-continuous <6 inches that are above handrail height

Wheeled equipment

Maintains 60 inches clear

Fire safety plan addresses relocation in an emergency

Equipment limited to carts, emergency medical equipment and lift/transport equipment



# Corridor Projections cont.

## Seating

Corridor 8 foot minimum width

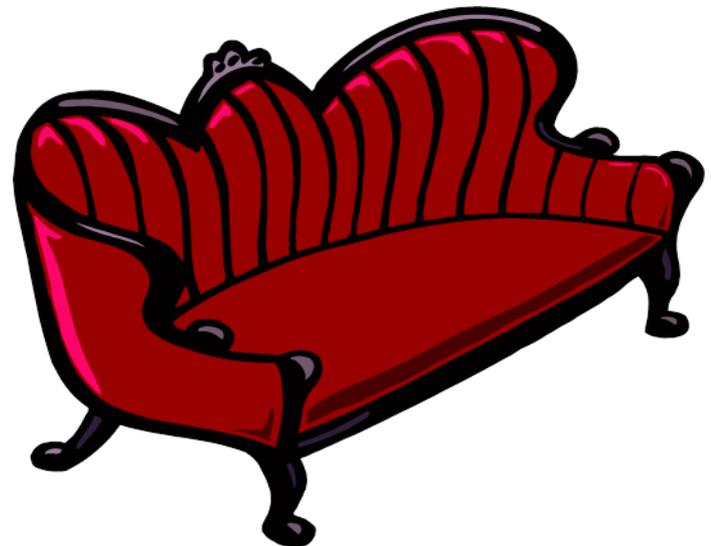
Fixed in place

Maintain 6 foot clear width

One side of corridor only

50 sq. ft. area maximums separated by 10 foot minimum

Smoke detection or direct visual supervision



# Hazard Areas (18/19.3.2.1)

Soiled linen with <64 gal. are not hazardous areas  
Converted Hazardous Areas (43.7.1.2)

Meet requirements for existing

Under 250 sq. ft.

Fully sprinklered building

Smoke resisting separation with self-closing door



# Cooking Facilities (18/19.3.2.5)

Serve maximum of 30 beds, single smoke compartment

Hood over cooking surfaces

Suppression system and fire extinguisher

No deep-fat frying

Disconnecting switch

Suppressed smoke compartment

Photoelectric smoke detectors (2) at 20 feet from hood

Not required if separated from corridor



# ABHR (18/19.3.2.6)

Aerosol limited to 18 oz.

One dispenser per room doesn't count toward total

Ignition source

Not above

Not within 1 inch horizontally

At least 1 inch below



# Fireplaces (18/19.5.2.3)

## Direct-Vent Gas Fireplaces

Not in a patient sleeping room

Smoke compartment fully sprinklered with quick response or residential sprinklers

Sealed glass front

Locked controls

Electrically supervised carbon monoxide detector in the room



# Fireplaces (18/19.5.2.3)

## Solid-Fuel Fireplaces

1 hour separation from patient sleeping areas

Enclosure “guaranteed” not to break up to 650F

Electrically supervised carbon monoxide detector in the room



# Decorations (18/19.7.5.6)

Now permitted to have “photographs, paintings, and other art” attached to walls, ceilings, or non-rated doors

No interference with door operation

Not exceeding 20% of wall area for non-sprinklered

Not exceeding 30% for space with sprinklered smoke compartment

Not exceeding 50% for resident rooms (less than 4) with sprinklered smoke compartment





# NFPA 10 (2010)

Now permits electronic monitoring of fire extinguishers  
Takes the place of monthly inspections



# NFPA 13 (2010)

Canopies do not require sprinklers based on the following:

Non-combustible construction materials with no storage

2 feet width if combustibles are stored below

Non-combustible finishes with the concealed combustible space protected by sprinklers or:

Concealed space filled with non-combustible insulation

Concealed space is <160 cu. ft. and remaining attic is sprinklered

Canopies under 55 sq. ft.

8.15.7



# NFPA 25 (2011)

Sprinkler Impairments (15.5.2)

Limits changed to 10 hours within a 24-hour period



# NFPA 80 (2010)

Fire Damper Inspection (19.4)

1 year after installation

Every 4 years

Combination smoke/fire dampers with fusible links

NFPA 105 has same requirements



# NFPA 110 (2010)

Specific gravity tested monthly (8.3.7.1)

Option to use conductance testing of battery

Spark-ignited generator sets (8.4.2.4)

30 minute run time or water and oil temp stabilize

3 year load test (8.4.9)





## For More Information

Health Facilities Engineering Section  
Bureau of Community and Health Systems  
State of Michigan – LARA

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