

ASC LSC Inspections

Iowa Association of Ambulatory Surgery Centers

April 6, 2019



Rick Day, State Fire Marshal Inspector

- State of Michigan Fire Marshal's Office
18 years
- AAAHC LSC Surveyor 6 years
- I have completed over 500 CMS Deemed
Status Life Safety Code Surveys in ASC's,
Hospitals and Nursing Homes.

Rick Day, State Fire Marshal Inspector

NFPA
Certified Fire
Inspector

NFPA
Certified Plan
Examiner

Rick Day, State Fire Marshal Inspector

CMS Advanced
Life Safety Code
Certified

CMS Advanced
Fire safety
Evaluation
Systems Certified



NFPA Technical Committees

- Fire Code
- Life Safety Code
- Health Care Facilities Code
- Building Construction – Chair
- Building Fire & Life Safety Directors
- Helicopter Facilities
- Emergency Power Supplies – NFPA 110, 111
- Fire Tests
- Fire Inspector & Plans Examiner Professional Qualifications



NFPA Technical Committees

- ▀ Pyrotechnics
- ▀ Recreational Vehicles
- ▀ Safety at Motorsports Venues
- ▀ Motion Picture and Television Industry
- ▀ Animal Housing Facilities

Center for Medicare & Medicaid Services – CMS

INFORMATION UP TO DATE AS OF 10/16/2016. INFORMATION SUBJECT TO CHANGE WITHOUT NOTICE.
 Center for Medicare and Medicaid Services
 Department of Health and Human Services
 Washington, D.C. 20201-1513

CMS
 Center for Medicare and Medicaid Services
 HCF NCCI 16-22-LSC

DATE: May 06, 2016
TO: State Survey Agency Directors
FROM: Director and Certification Group
SUBJECT: Notification of Final Rule Published: Adoption of 2012 Life Safety and Health Care Facilities Code

Memorandum Summary:
 The Fire Safety Requirements for Certain Health Care Facilities, (on May 6, 2016, the Department of Health and Human Services (HHS) published a final rule (79 FR 26446) which requires that fire safety requirements for health care facilities be updated to reflect the 2012 edition of the Life Safety Code (LSC) published by the International Association of Fire Chiefs (IAFC) and the 2012 edition of the Fire Protection Association (FPA) 1501 and 1502 editions of the Life Safety Code, NFPA 99.

The Fire Safety Final Rule outlines the requirements for certain Medicare and Medicaid certified providers and suppliers to meet certain fire safety requirements. The final rule includes the adoption of the 2012 edition of the LSC, NFPA 99, and additionally the adoption of the 2012 edition of the FPA 1501 and 1502 editions of the LSC and associated reference documents. CMS also established certain exceptions to the adoption of the 2012 Life Safety and Health Care Facilities Codes which are described in the regulation.

The final Rule can be located at <http://www.federalregister.gov/articles/2016/05/06/2016-09411-fire-safety-requirements-for-certain-health-care-facilities>.

CMS will be updating its surveyor training materials, guidance and forms to reflect these changes. Additional information about these updates will be forthcoming.

Training: CMS is currently developing online training that will be accessible ahead of the implementation date. We will send out a subsequent series of Admin Info Memos regarding training details.

Center for
Medicare
&
Medicaid
Services –
CMS

Notification of Final Rule
Published – May 4, 2016

Effective Date July 5, 2016

Requires Providers to Meet
NFPA 101, 2012 Edition

Requires Providers to Meet
NFPA 99, 2012 Edition

Center for Medicare & Medicaid Services

- CMS

Must Comply
with CMS
Regulations

Local
Jurisdictions
Don't Override
CMS
Requirements

State
Jurisdictions
Don't Override
CMS
Requirements

NFPA
Applicable
Reference
Codes
NFPA 101
Life Safety
Code



Chapter 20 New
Ambulatory Health Care
Occupancies



Chapter 21 Existing
Ambulatory Health Care
Occupancies



Chapter 38 New Business
Occupancies



Chapter 39 Existing Business
Occupancies

NFPA
Applicable
Reference
Codes
NFPA 99
Health Care
Facility's Code



New Requirements



Existing Requirements



Wet Procedure Room Risk Assment



Building System Category Risk
Assment



No CMS Code Requiring Piped Med-Gas Systems In
ASC'S but if you have one you **MUST** meet the
requirements as outlined in NFPA 99

NFPA Applicable Referenced Codes

NFPA 99 Health Care Facility Code

tural space for housing telecommunications equipment, cable terminations, and cross-connect cabling, serving a floor or an area of a floor. (EIS)

Chapter 4 Fundamentals

4.1* Building System Categories. Building systems in health care facilities shall be designed to meet system Category 1 through Category 4 requirements as detailed in this code.

4.1.1* Category 1. Facility systems in which failure of such equipment or system is likely to cause major injury or death of patients or caregivers shall be designed to meet system Category 1 requirements as defined in this code.

4.1.2* Category 2. Facility systems in which failure of such equipment is likely to cause minor injury to patients or caregivers shall be designed to meet system Category 2 requirements as defined in this code.

4.1.3 Category 3. Facility systems in which failure of such equipment is not likely to cause injury to patients or caregivers, but can cause patient discomfort, shall be designed to meet system Category 3 requirements as defined in this code.

4.1.4 Category 4. Facility systems in which failure of such equipment would have no impact on patient care shall be designed to meet system Category 4 requirements as defined in this code.

4.2* Risk Assessment. Categories shall be determined by following and documenting a defined risk assessment procedure.

4.3 Application. The Category definitions in Chapter 4 shall apply to Chapters 5 through 11.

NFPA Applicable Reference Codes & Standard

NFPA 10 – 2010
Standard for
Portable Fire
Extinguishers

NFPA 13 - 2010
Standard for the
installation of
Sprinkler Systems

NFPA 25 - 2010
Standard for the
Inspection, Testing and
Maintenance of
Water-Based Fire
Protection Systems

NFPA 70 – 2011
National Electrical
Code

NFPA 72 – 2010
National Fire Alarm
& Signaling Code

NFPA 80 – 2010
Standard for Fire
Doors & Other
Opening
Protectives

NFPA 110 - 2010
Standard for
Emergency & Stand
By Power
(Generators)

CMS - Waivers

Always Let The Inspection Team
Know At The Opening
Conference If You Have Any
Active Waivers That Have Been
Approved by CMS

Waivers Are Only Applicable Until
Next inspection / Survey

Waivers Can Only Be Granted For
Violations Cited During An
Inspection



Types of CMS Waivers

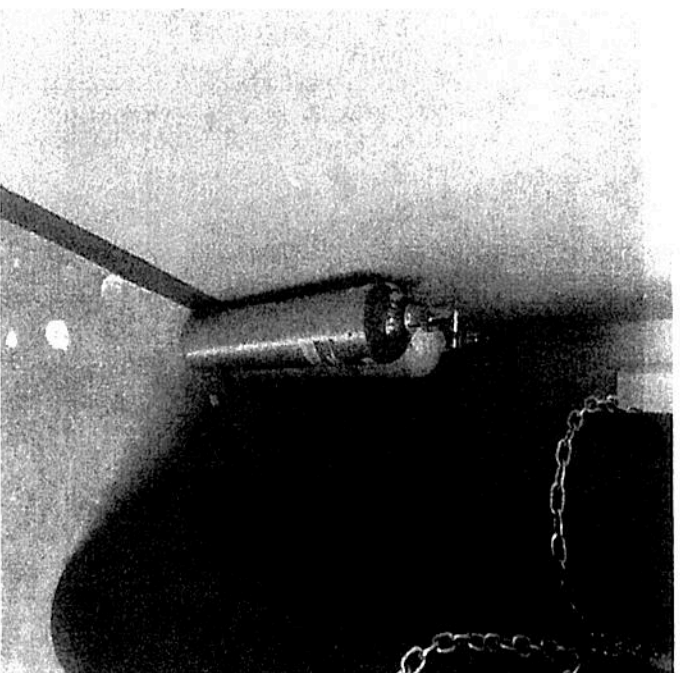
- ▀ Categorical - No Longer Exist – Used to Gap Code Cycles
- ▀ Time – Facility Needs More Time To Complete Repairs
- ▀ Financial Hardship – Facility Has Documented a Financial Hardship
- ▀ FSES – Fire Safety Equivalency Not Applicable in ASC's
- ▀ **WAIVERS ARE NOT ALLOWED FOR NEW FACILITIES**



LSC Inspection / Survey Process

- ▀ Building Construction Type
- ▀ Fire Rated Separations / ASC Waiting Room Separations
- ▀ Compliant Exiting
- ▀ Life Safety Systems
 - ❖ Sprinkler, Fire Alarm, Med-Gas, Generator, Electrical System
- ▀ Records

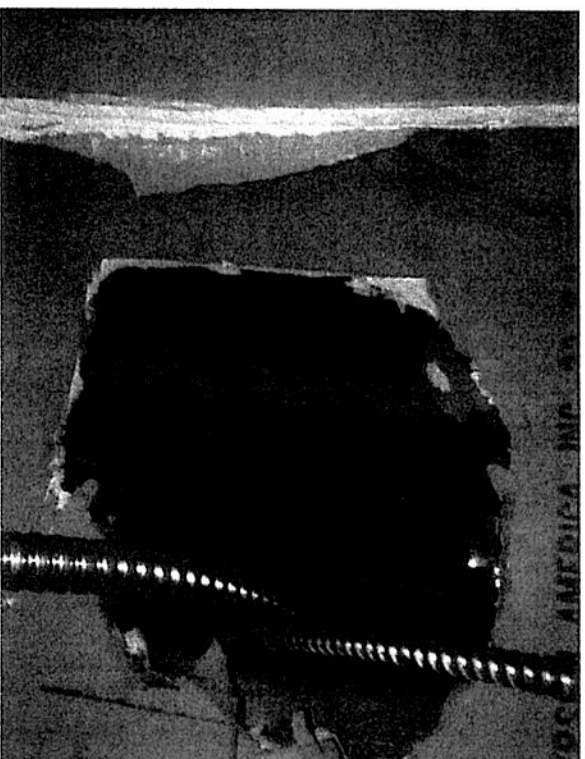
LSC Inspections – What We See



LSC Inspections – What We See



LSC Inspections – What We See



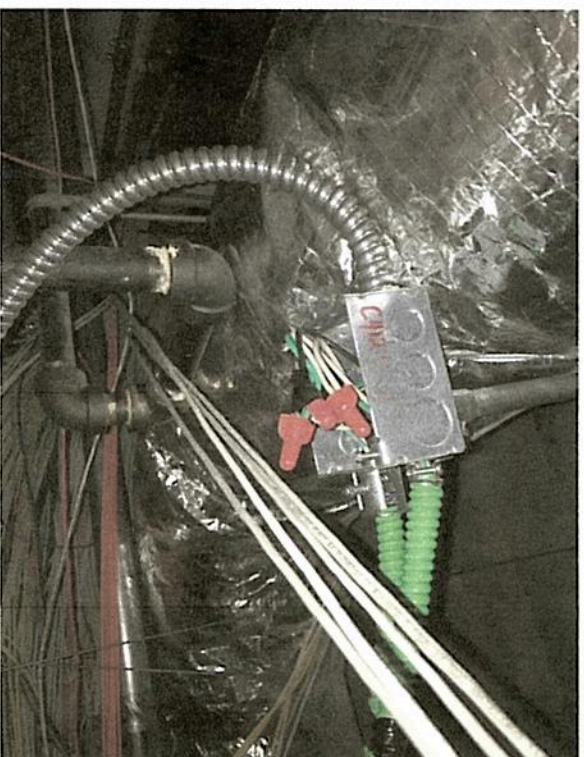
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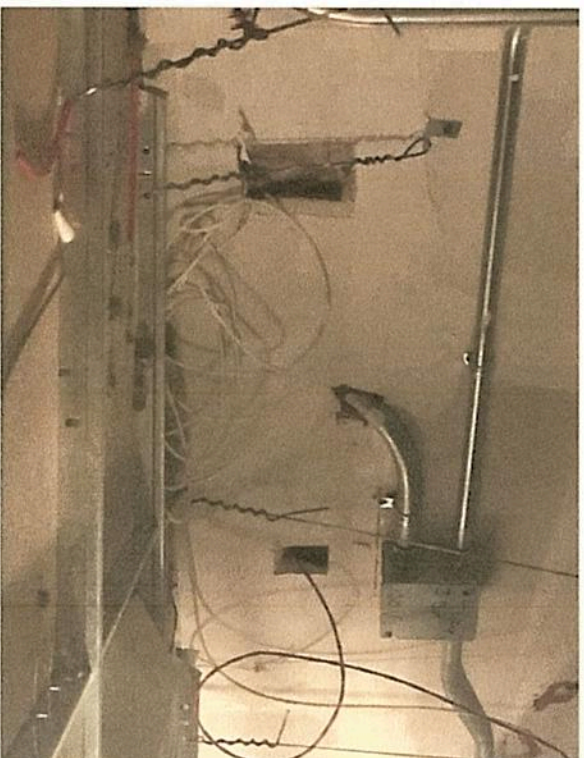
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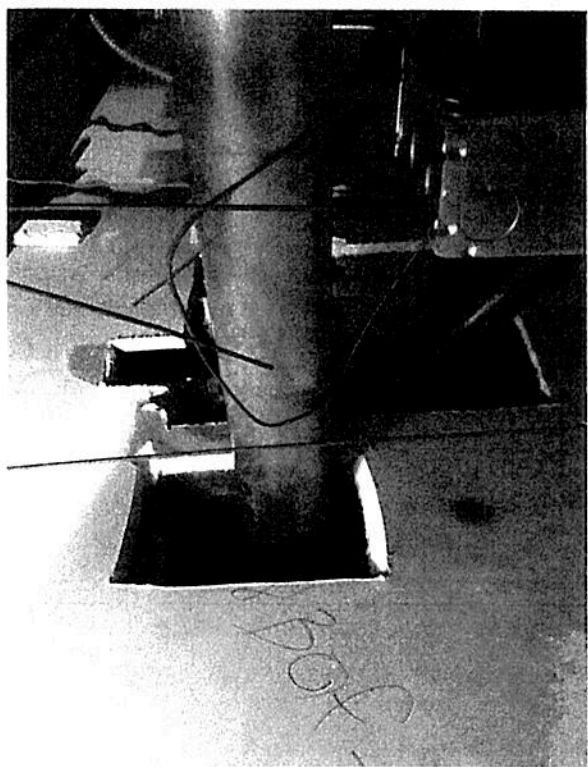
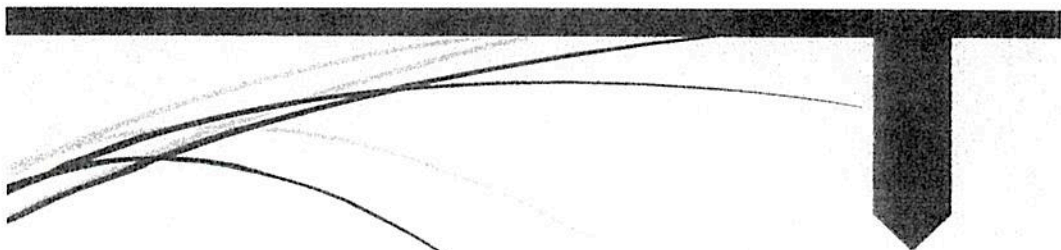


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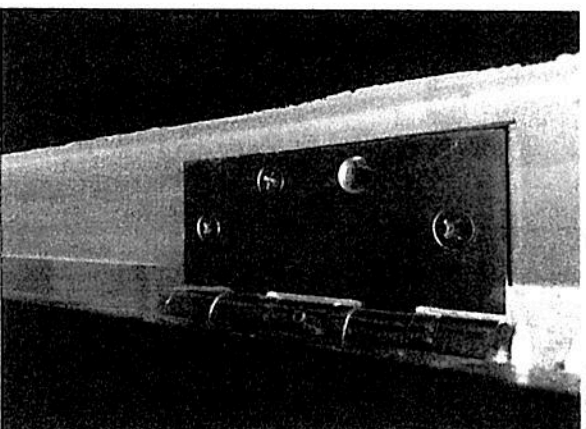




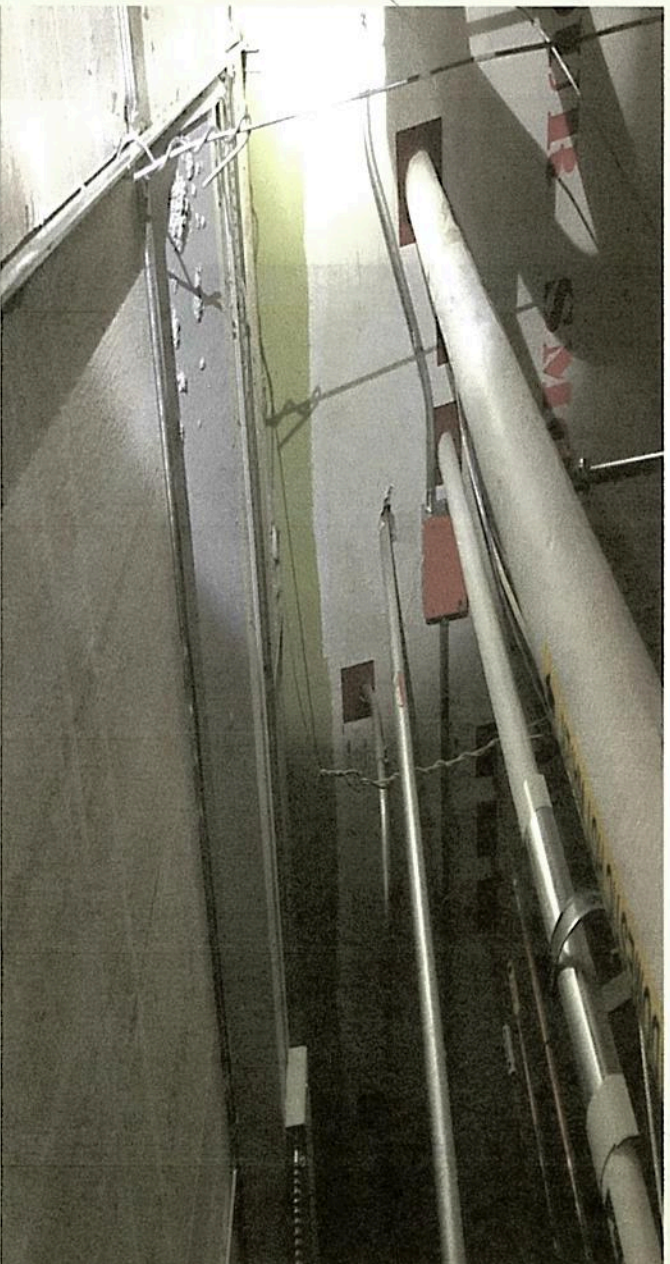
LSC Inspections – What We See



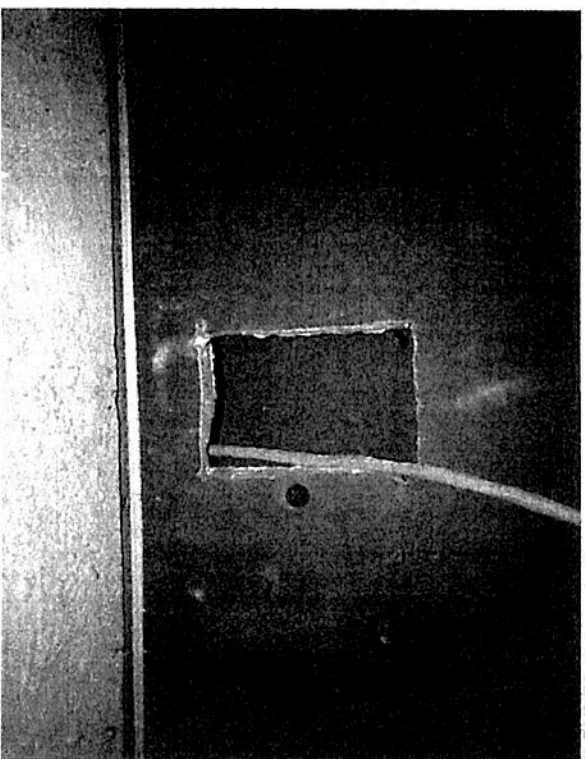
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LSC Inspections – What We See



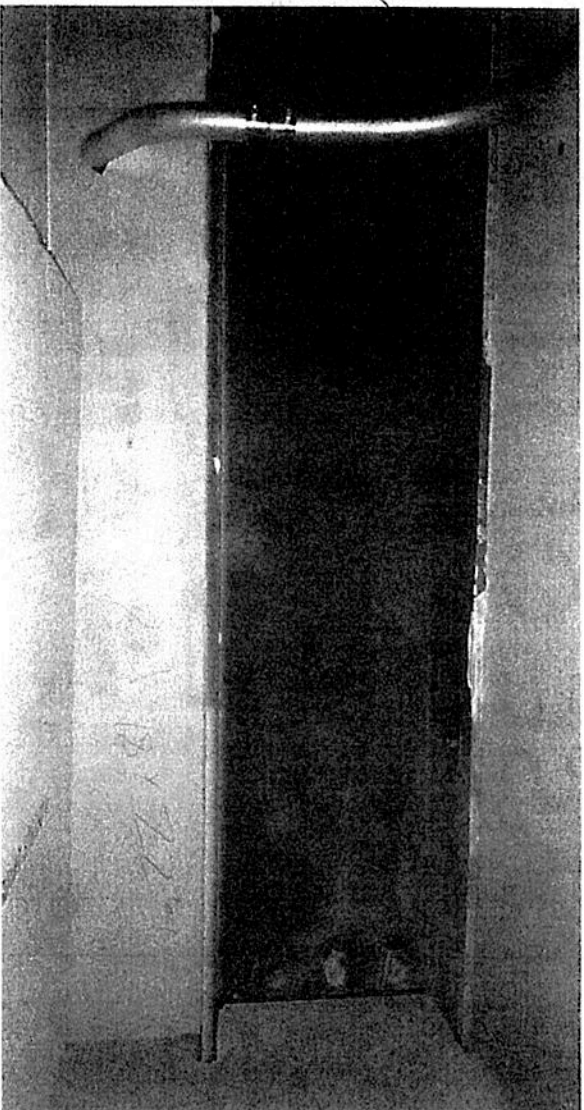
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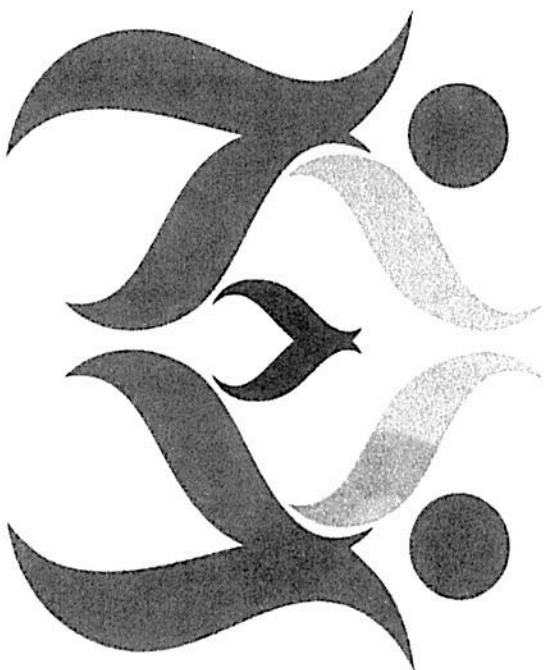


LSC Inspections – What We See



LSC Inspections – What We See





Fire is
Everyone's
Fight TM

THANK YOU

