

Life Safety Code Considerations During COVID-19 Management



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Life Safety Compliance

Common LSC Issues

- Fire Drills
- EOP Modifications- LSC Changes
- 1135 Waiver
- Inspection, Testing & Maintenance of Systems
- ABHR Use and Storage Practices
- General Storage
- Means of Egress
- Isolation Provisions / Alternates Life Safety Measures (ALSM)
- Negative Pressurization



Common LSC Issues



Emergency Operations Plan ~ P & P Modifications

- o Add language to assist with compliance mitigation
- o Variance from strict compliance of LSC during Emergency Activation

1135 Waivers for LSC



Common LSC Issues

Fire Drills

- o One drill per shift per quarter
- o NO monthly fire drill requirement
 - o Common practice for monthly drills but not required
- o Silent drills between 9:00 pm and 6:00 am
- o Properly documented
- o Fire drill management during COVID-19
 - o Defer to end of Q2-2020
 - o Drills on same day, if needed
 - o Virtual fire drills?



Fire Drills- 1135 Waiver



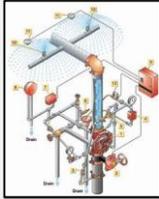
• **Fire Drills:** Due to the inadvisability of quarterly fire drills that move and mass staff together, we will instead permit a documented **orientation training program related to the current fire plan**, which considers current facility conditions. The training will instruct employees, including existing, new or temporary employees, on their current duties, life safety procedures and the fire protection devices in their assigned area.

Refer to: 2012 LSC, sections 18/19.7.1.6

Common LSC Issues

Inspection, Testing and Maintenance (ITM)

- o Fire Alarm System
- o Fire Suppression Systems
 - o Fire Sprinkler System
 - o Commercial Kitchen
 - o FM 200 – Computer Equipment
- o Emergency Generator
- o Means of Egress
 - o Exit signs
 - o Emergency lighting units



ITM Frequency



NFPA 72-2010, section 3.2.106 defines time for fire alarm system testing and inspection as follows:

- o **Weekly:** 52 times per year, once per calendar week
- o **Monthly:** 12 times per year, once per calendar month
- o **Quarterly:** 4 times per year, with a minimum of 2 months and a maximum of 4 months
- o **Semiannual:** Twice per year, with a minimum of 4 months, and a maximum of 8 months
- o **Annual:** Once per year, with a minimum of 9 months and a maximum of 15 months



1135 Waiver for ITM



- CMS is temporarily modifying these requirements to the extent necessary to permit these facilities to adjust scheduled inspection, testing and maintenance (ITM) frequencies and activities for facility and medical equipment.
- CMS is temporarily modifying these provisions to the extent necessary to permit these facilities to adjust scheduled ITM frequencies and activities required by the LSC and HCFC. The following LSC and HCFC ITM are considered critical **are not** included in this waiver:
 - Sprinkler system monthly electric motor-driven and weekly diesel engine-driven fire pump testing.
 - Portable fire extinguisher monthly inspection.
 - Elevators with firefighters' emergency operations monthly testing.
 - Emergency generator 30 continuous minute monthly testing and associated transfer switch monthly testing.
 - Means of egress daily inspection in areas that have undergone construction, repair, alterations or additions to ensure its ability to be used instantly in case of emergency.

Alcohol Based Hand Rub (ABHR)

- Corridor is at least 6 ft. wide (8 ft. in health care)
- Maximum individual dispenser capacity- 0.32 gal. of fluid
 - 0.53 gal. in suites
- Maximum Level 1 aerosol dispensers- 18 oz.
- Minimum of 4 ft. horizontal spacing
- Maximum of 10 gal. aggregate limit in smoke compartment
 - Excluding one (1) dispenser per room
- Storage of more than 5 gallons of ABHR solution in a smoke compartment requires flammable liquids locker (NFPA 30)
- Dispensers cannot be within 1 inch of an ignition source
- Fire sprinklers required if dispenser installed over carpeting
- ABHR solution does not exceed 95% concentration
- Dispenser protected against inappropriate access



ABHR- 1135 Waiver



Alcohol-based Hand-Rub (ABHR) Dispensers: We are waiving the prescriptive requirements for the placement of alcohol based hand rub (ABHR) dispensers for use by staff and others due to the need for the increased use of ABHR in infection control. However, ABHRs contain ethyl alcohol, which is considered a flammable liquid, and there are restrictions on the storage and location of the containers. This includes restricting access by certain patient/resident population to prevent accidental ingestion. Due to the increased fire risk for bulk containers (over five gallons) those will still need to be stored in a protected hazardous materials area.

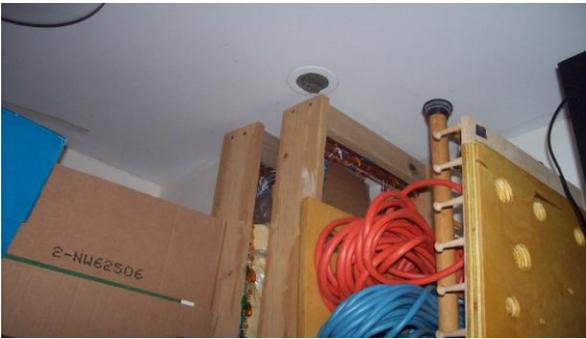
Refer to: 2012 LSC, sections 18119.3.2.6. In addition, facilities should continue to protect ABHR dispensers against inappropriate use as required by 42 CFR §482.41(b)(7) for hospitals; §485.623(c)(5) for CAHs; §418.110(d)(4) for inpatient hospice; §483.470(i)(5)(ii) for ICF/IIDs and §483.90(a)(4) for SNF/NFs.

Means of Egress



General Storage Practices









Isolation Measures



Temporary Construction- 1135

Temporary Construction: CMS is waiving requirements that would otherwise not permit temporary walls and barriers between patients.

Refer to: 2012 LSC, sections 18/19.3.3.2.



Alternate Life Safety Measures

Interim Life Safety Measures

Item	Inspected	Notes
1. All exits clearly marked and unobstructed?		
2. All exits clearly marked with illuminated exit signs?		
3. All exits clearly marked with illuminated exit signs?		
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20. All exits clearly marked with illuminated exit signs?		

ILSM rounds can be made a daily or weekly PM and turned on and off as needed based on the ILSM Assessment





Compliance = Documentation



Compliance



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QUESTIONS





"Stan on Demand"

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