

December 14, 2017 "Lunch & Learn" Webinar

# **TOP 10 CITES**

### By CMS and the Joint Commission

Presented by: Bill Lauzon Heather Werner





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# TOP 10 CITES

By CMS and the Joint Commission

### AGENDA

## 1. Scoring Systems

2. Overview: TOP 10 CITES of TJC & CMS 3. One-on-One Detail & HOW TO PREVENT

# WHAT IS A CITATION?

- A breach of contract
- As judged by your AHJ



# WHAT "Ruler" does the AHJ use?

• The requirements of the contract



### **Accreditation Standards**

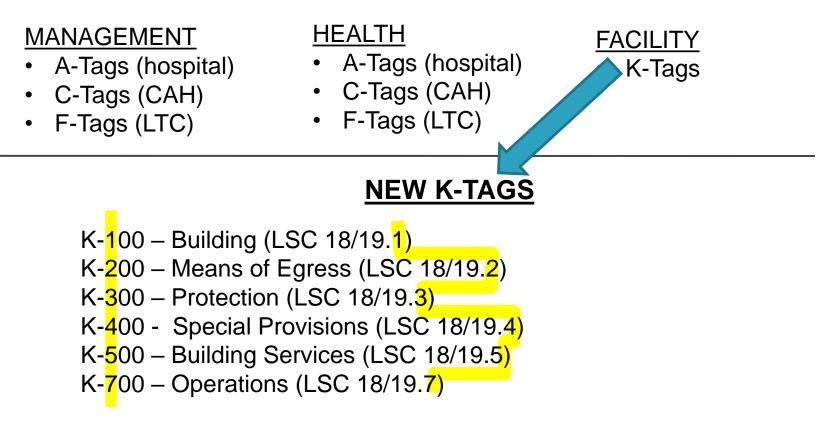
- Management
- Health
- Facility
  - Life Safety Code-2012
  - Check lists developed by the AHJ
  - His/Her Own Interpretations

### **Compliance Standards**

- Management
- Health
- Facility

### **SCORING SYSTEMS**

### CENTER for MEDICARE & MEDICAID SERVICES Compliance Standards



K-900 – Risk Assessment, Med Gas, Electrical, HVAC (NFPA 99)

# SCORING SYSTEMS

# THE JOINT COMMISSION

### **Accreditation Standards**

MANAGEMENT

- Human Relations
- Leadership
- Emergency
- Many more

- <u>HEALTH</u>
- Infection Control
- Surgery
- Therapies
- Many more

### **FACILITY**

- Envir.of Care
- Life Safety

### **ENVIRONMENT OF CARE STANDARDS**

EOC Plans EC.01.01.01 Safety & Security Stds EC.02.01 series (.01, .03, .05) Haz Mat Stds EC.02.02.01 Fire Safety Stds EC.02.03 series (.03, .05) Med Equip Stds EC.02.04 series (.01, .03, .05) Utility Stds EC.02.05 series (.01, .03, .05, .07, .09) Other Envir Stds EC.02.06 series (.01, .03, .05) Staff Competence Stds EC.03.01.01 Monitor & Improve Stds EC.04.01 series (.01, .03, .05)

# SCORING SYSTEMS

# THE JOINT COMMISSION

### **Accreditation Standards**

MANAGEMENT

- Human Relations
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<u>HEALTH</u>

- Infection Control
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### FACILITY

- Envir.of Care
- Life Safety

### LIFE SAFETY STANDARDS

Statement of ConditionLS.01.01.01ILSMLS.01.02.01

### HEALTHCARE OCCUPANCIES

Gen Building ReqLS.02.01.10Means of Egress ReqLS.02.01.20Protection ReqLS.02.01.30Special Prov. ReqLS.02.01.40Building Service ReqLS.02.01.50Operating Features ReqLS.02.01.70

AMBULATORY OCCUPANCIES AHC Requirements LS.03.01 series

RESIDENTIAL OCCUPANCIESLodging & Rooming LS.04.01 seriesHotels & DormsLS.04.02 series

### **SCORING SYSTEMS**

## Difficult to compare TJC & CMS Cites because they have <u>different scoring methods</u>

### THE JOINT COMMISSION

- Standards cover more than NFPA
- Delves into management actions
- Tags for minority of LSC requirements
- One "others not listed" per section

### <u>CMS</u>

- Standards limited to specific NFPA
- Requires specific policies/plans
- Tags for majority of LSC requirements
- One "others not listed" per section

<u>CAN'T</u> USE EITHER METHOD TO SATISFY THE OTHER (Follow the most restrictive)



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# **TOP 10 CITES**



### **TOP 10 FACILITY CITES**

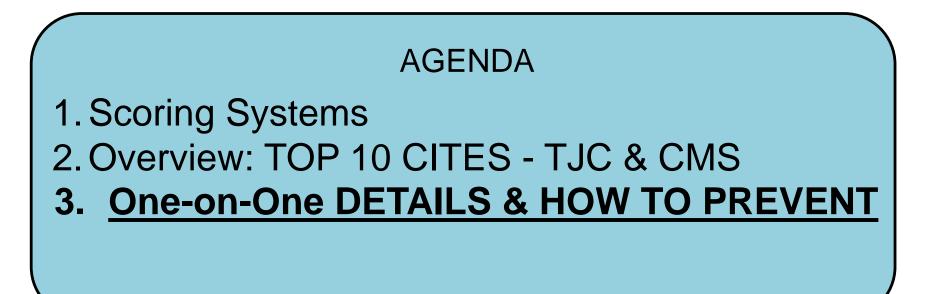
THE JOINT COMMISSION	CMS (WIS DQA)
#1-LS.02.01.35–Fire Suppression Sys	#1-K353-Sprinkler Testing #12-K351-Sprinkler Install
#2-LS.02.01.30–Protect Bldg. from Fire	#3-K321-Haz Areas #5-K362/3-Corridor Walls & Doors #8-K372-Smoke Barriers
#3-EC.02.05.01–Utility Sys Risk Mgmt.	(not surveyed)
#4-EC.02.06.01–Safe & Functional Envier.	#7-K341-Fire Alarm Install
#5-LS.02.01.10–Gen Bldg. & Fire Protect.	#34-K161-Construction Type
#6-EC.02.02.01–Hazardous Mtl. Mgmt.	(not surveyed)
#7-LS.02.01.20–Means of Egress	#11-K211-Means of Egress
#8-EC.02.05.05–Utility System Inspect.	#1-K353-Sprinkler Testing #6-K511-Gas & Elec Utilities
#9-EC.02.03.03–Fire Drills	#2-K712 – Fire Drills
(Not in top JC 10)	#4-K345-Fire Alarm Testing #9-K324-Cooking Facilities #10-K355-Fire Extinguishers

$\begin{array}{c} \hline & \\ \hline \\ \hline$	<b>NURSING HOMES</b>
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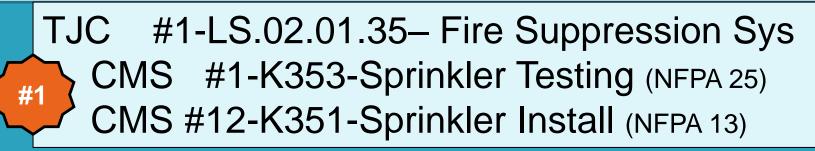


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# **TOP 10 CITES**

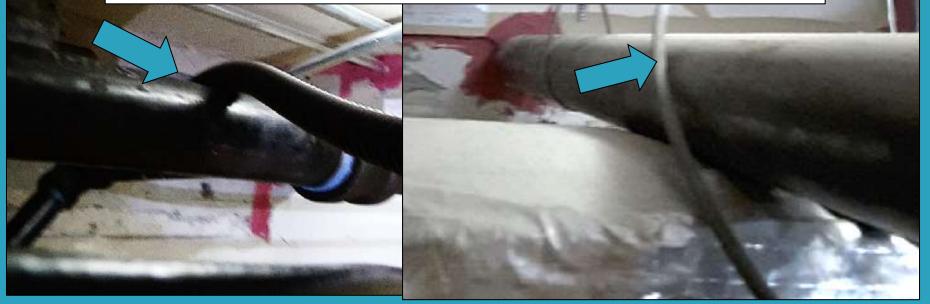


Sprinkler Support



(1) <u>EP 4 – Piping is not used to support any other item</u> (NFPA 13-2010, 9.1.1.7 Sprinkler piping or hangers shall not be used to support non-system components)

Surveyors use "Zero Tolerance" – NOTHING even touching



# (1) <u>EP 4</u> – Piping is not used to <u>support any other</u> item

I (NFPA 13-2010, 9.1.1.7 Sprinkler piping or hangers shall not be used to support non-system components)

### PRIMARY OFFENDERS:

Cabling

ideas

Electrical



# **3 POSSIBLE PREVENTION IDEAS:**

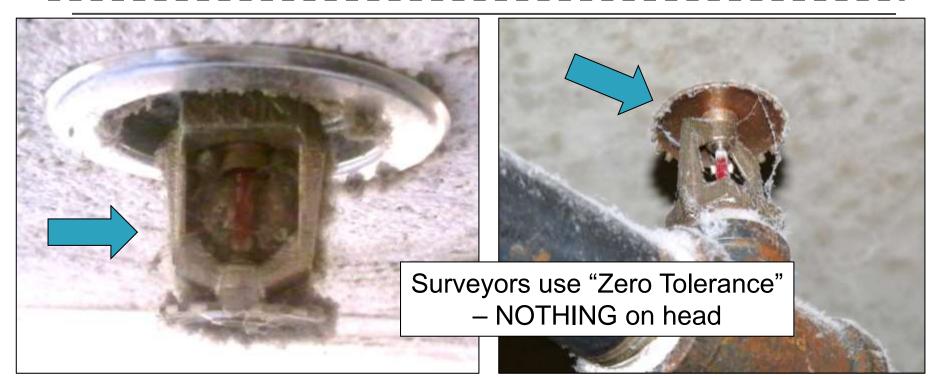
- 1. Better inspection prior to ceiling closure
- 2. Implement a contractor training program
- 3. Ceiling permit program

#1

Sprinkler Dust



(2) EP 5 – Sprinklers are free of foreign materials, corrosion, paint, etc.; not damaged & have necessary escutcheon plates installed (NFPA 25-2011, 5.2.1.1.1)



Sprinkler Dust

<u>**EP 5**</u> – Sprinklers are free of <u>foreign materials</u>, corrosion, (2) paint, act; not damaged & have necessary escutcheon , plates installed (NFPA 25-2011, 5.2.1.1.1) #1

### **PRIMARY OFFENDERS:** Poor filtration

- Heavy linen users
- **Dish rooms**

ideas

High air flow



# **3 POSSIBLE PREVENTION IDEAS:**

- Better inspection prior to survey
- Routine cleaning in high problem areas 2.
- 3. Review filters & air flow practices

High Storage



(3) EP 6 – <u>18</u> or more of open space is maintained below the sprinkler deflector (NFPA 25-2011, 5.2.1.2 The minimum clearance required by the installation standard shall be maintained below all sprinkler deflectors.)

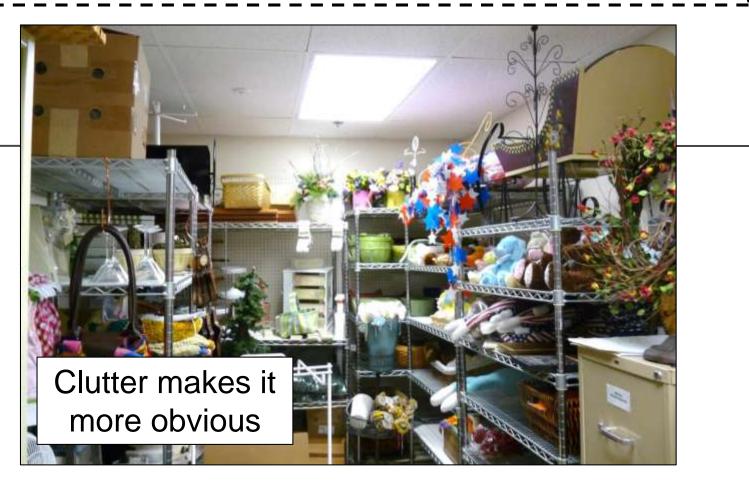
Not applicable at perimeter walls because it doesn't block water flow; Unless ....



Head is located directly above shelf

High Storage

<u>EP 6</u> – <u>18</u>" or more of open space is maintained below the (3) sprinkler deflector (NFPA 25-2011, 5.2.1.2 The minimum clearance required by the installation standard shall be maintained below all sprinkler deflectors.)



High Storage

<u>EP 6</u> – <u>18</u>" or more of open space is maintained below the
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### **PRIMARY OFFENDERS**:

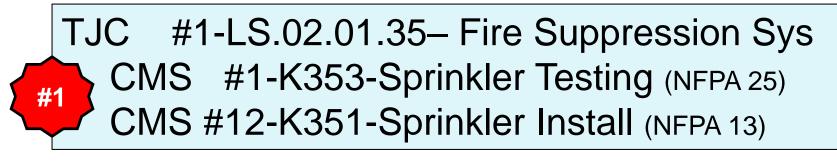
ideas

- Storage with center shelves
- Shelves with sprinklers directly overhead

# **3 POSSIBLE PREVENTION IDEAS:**

- 1. Draw line on wall, 18" below deflector
- 2. Sign by line: "NO storage above this line
- 3. Sloped top shelf

Spare Sprinklers



(4) EP 7 – Spare inventory of heads is maintained (NFPA 25-2011, 5.2.1.4 The supply of spare sprinklers shall be inspected annually for (1) correct number & type of sprinklers; (2) sprinkler wrench for each type of head)

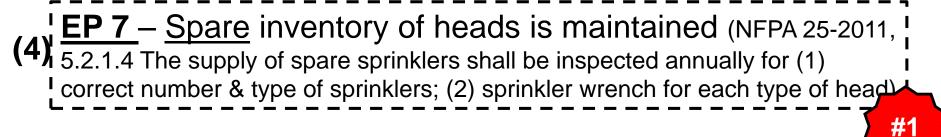


Spare Sprinklers

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**Spare Sprinklers** 



### PRIMARY OFFENDERS:

ideas

- Older facilities with few sprinkler projects
- Facilities with > 1000 heads (250KSF)

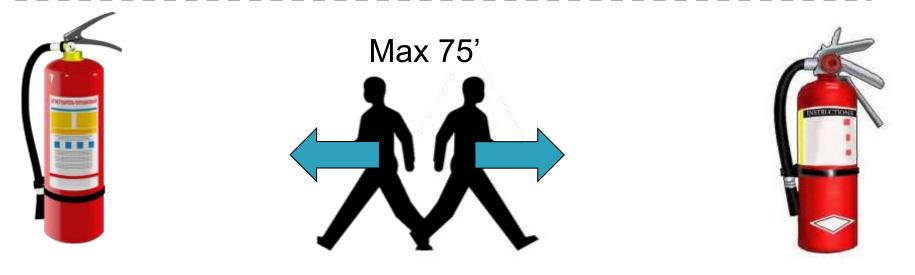
# **2 POSSIBLE PREVENTION IDEAS:**

- Have sprinkler contractor review sprinkler types in bldg, look in spare cabinet & update as needed
- 2. Generate an inventory list

Extinguisher Install

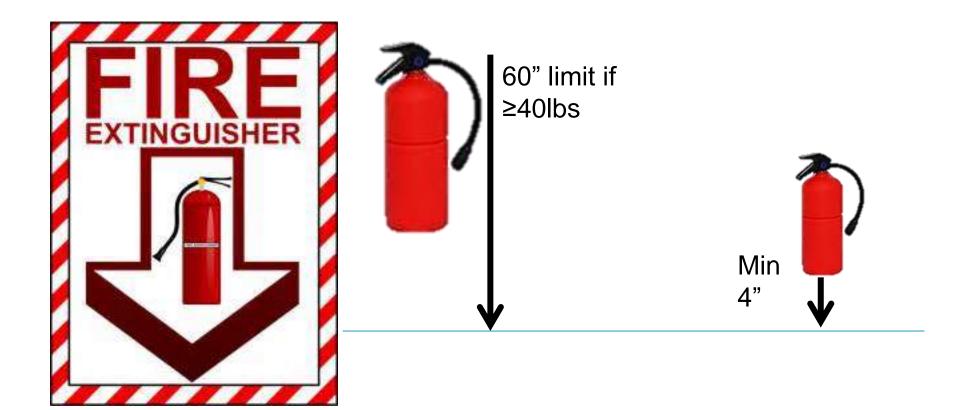


(5) <u>EP 10</u> – <u>Travel Distance</u> to the nearest fire extinguisher is 75' or less; extinguisher has appropriate <u>signage</u>; mounted at least 4" off the floor; <u>mounted</u> less than 5' above the floor if 40 lb. or more (NFPA 10-2010, 6.2.1.1; 6.1.3.8.1)



**Extinguisher Install** 

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Extinguisher Install

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## PRIMARY OFFENDERS:

CO2 Extinguishers

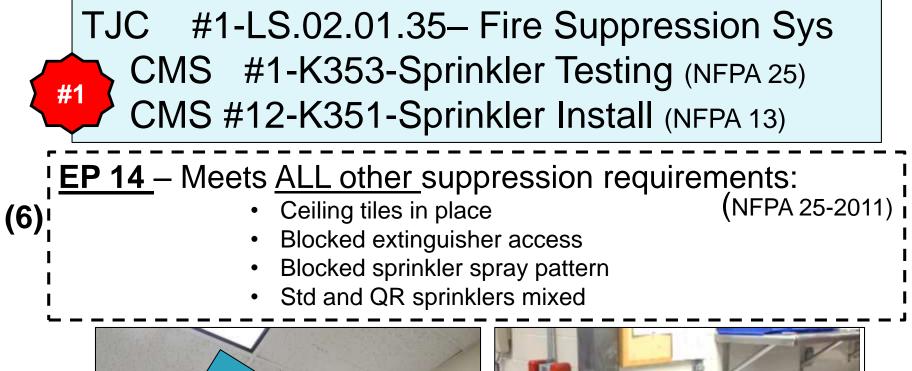
ideas

Extinguishers on floor

# **2 POSSIBLE PREVENTION IDEAS:**

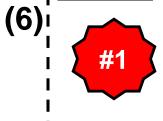
- At next extinguisher check have inspector document (1) sign, (2) height handle is above floor, (3) height bottom is above floor
- 2. Mark location on a floor plan; Evaluate floor plan for travel distance

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### **<u>EP 14</u>** – Meets <u>ALL other</u> suppression requirements:



Ceiling tiles in place Blocked extinguisher access Blocked sprinkler spray pattern Std and QR sprinklers mixed



ideas

### **PRIMARY OFFENDERS**:

- Cable work & fast-track equip installs
- Kitchen, Storage



# **<u>3 POSSIBLE PREVENTION IDEAS:</u>**

- 1. Review ceilings after all install work
- 2. Monthly ceiling inspection
- 3. Monthly extinguisher must use zero tolerance

#1

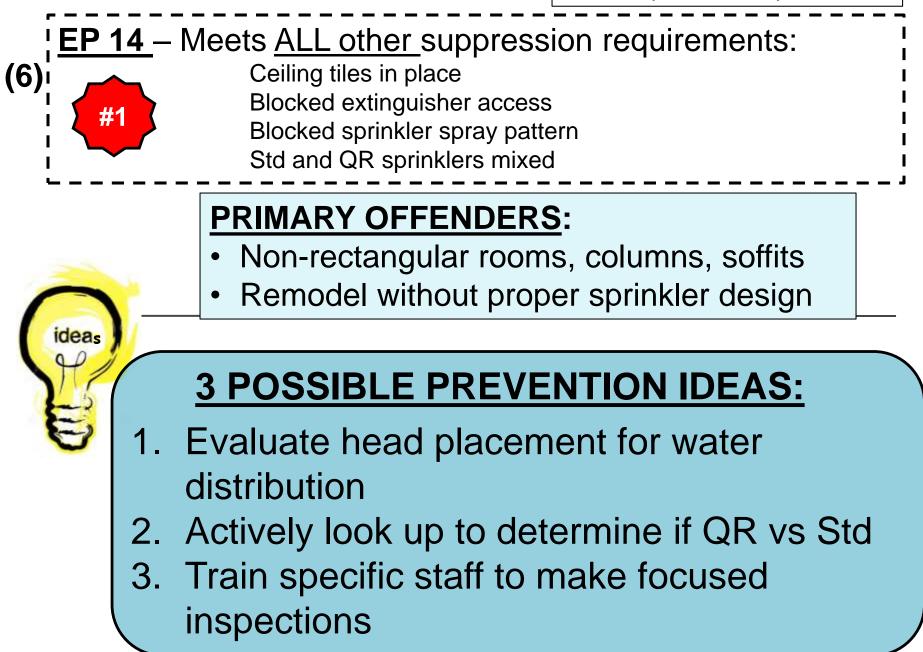
(NFPA 25-2011)

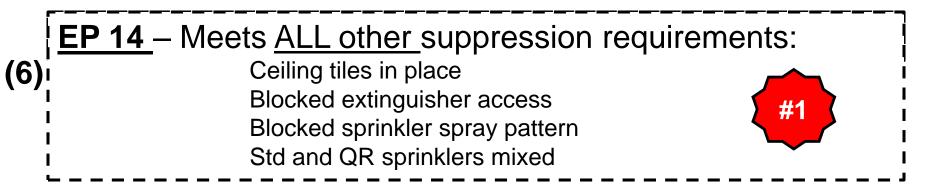
28

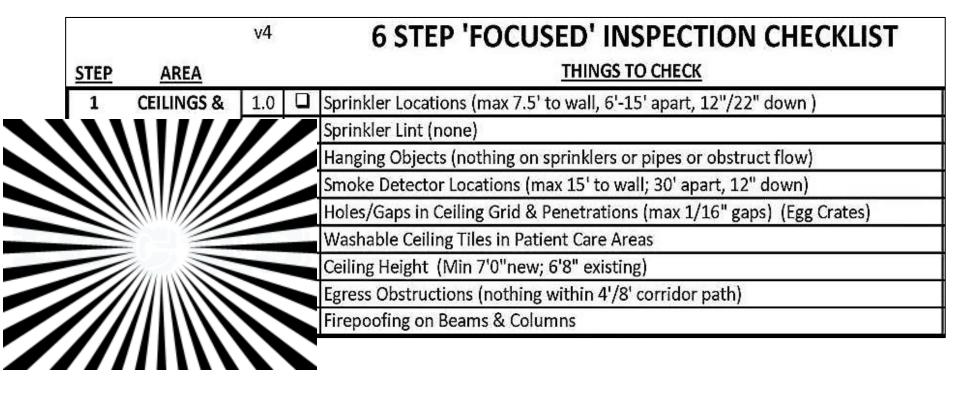
### (6) <u>EP 14</u> – Meets <u>ALL other</u> suppression requirements: Ceiling tiles in place (NFPA)

Ceiling tiles in place Blocked extinguisher access Blocked sprinkler spray pattern Std and QR sprinklers mixed





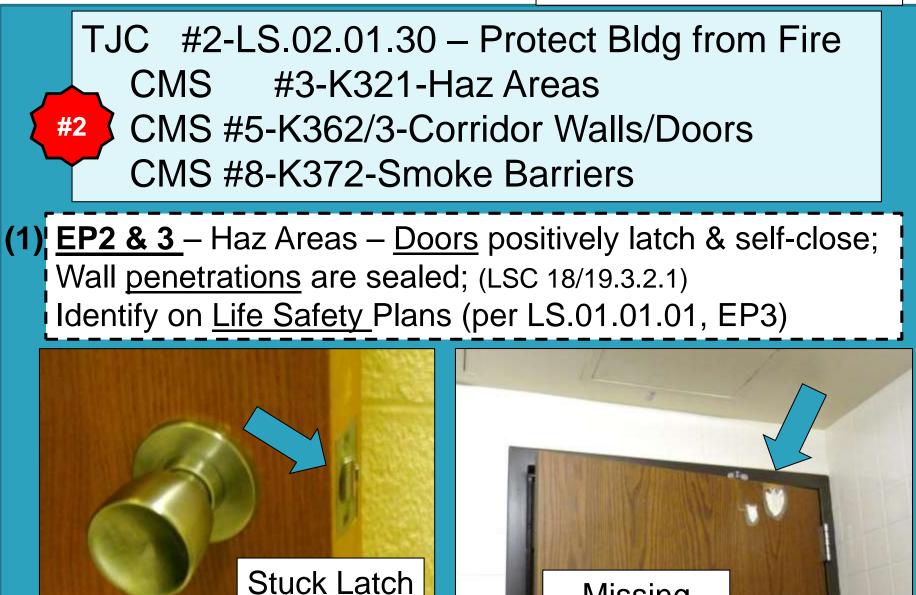




Missing

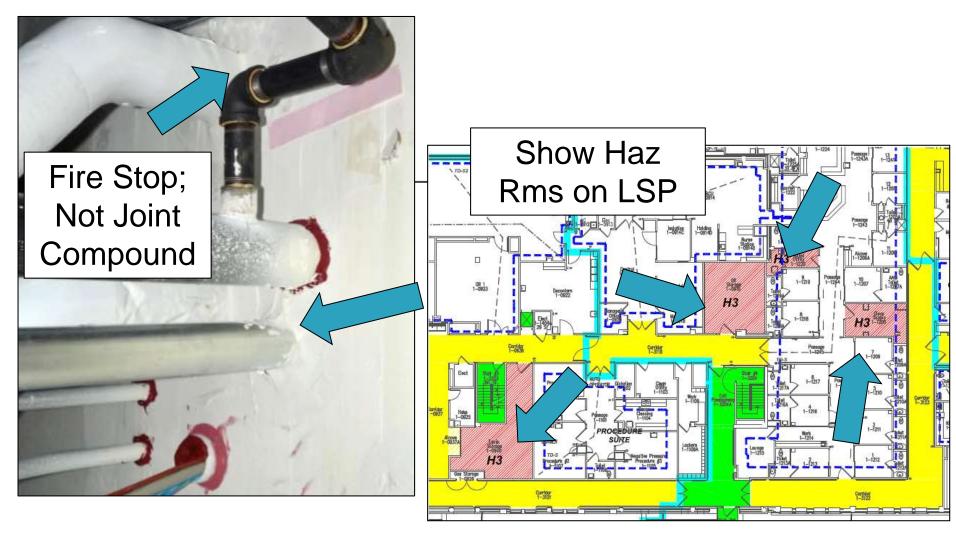
Closer

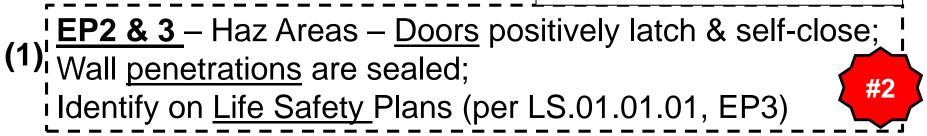
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Hazardous Walls & Doors

(1) EP2 & 3 – Haz Areas – <u>Doors</u> positively latch & self-close; Wall <u>penetrations</u> are sealed; (LSC 18/19.3.2.1) Identify on <u>Life Safety</u> Plans (per LS.01.01.01, EP3)





### **PRIMARY OFFENDERS**:

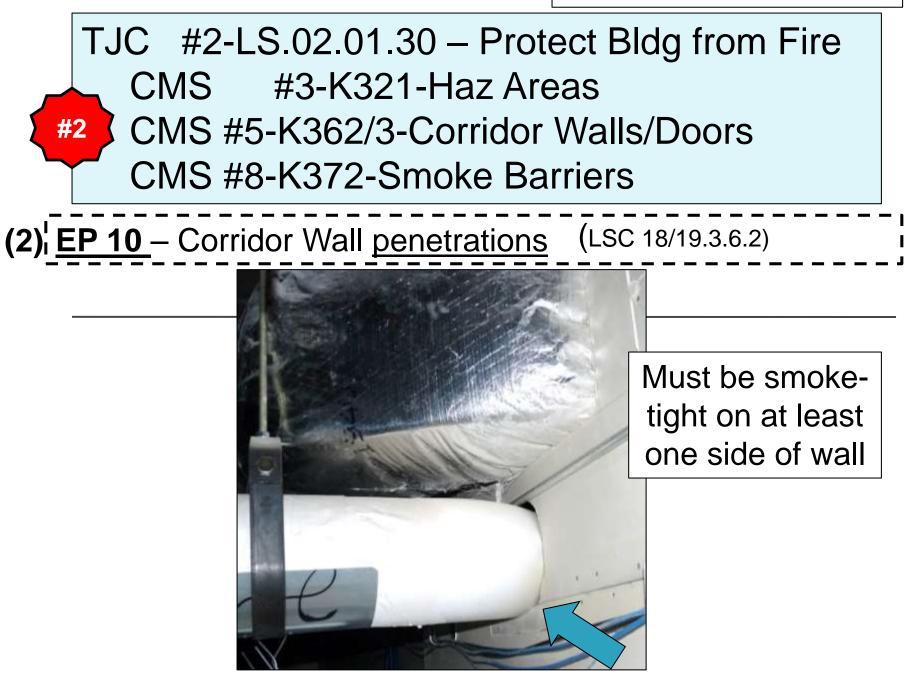
ideas

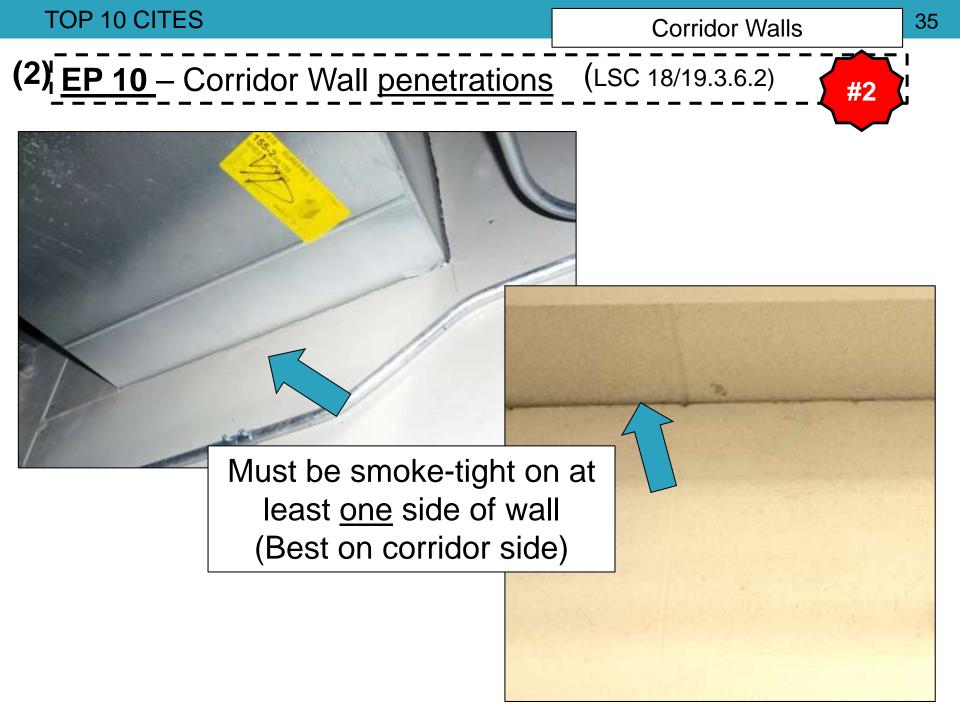
- Lack of above ceiling construction inspection
- Use of B&W Life Safety Plan

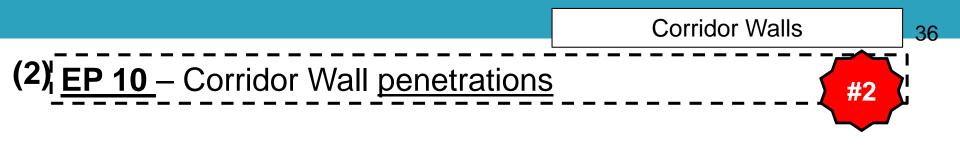
# **3 POSSIBLE PREVENTION IDEAS:**

- 1. Perform your own inspections above-ceiling
- 2. Perform annual haz room inspection
- Color all Hazardous rooms on your LSP to make them stand-out

**Corridor Walls** 







### **PRIMARY OFFENDERS**:

ideas

- Lack of above ceiling construction inspection
- Use of B&W Life Safety Plan

# **3 POSSIBLE PREVENTION IDEAS:**

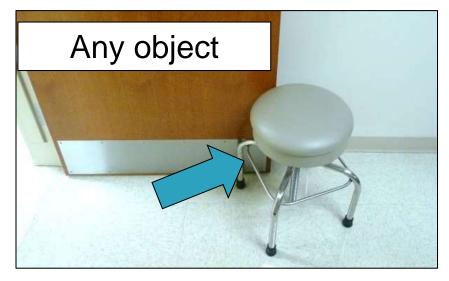
- 1. Perform your own inspections above-ceiling
- 2. Perform annual corridor inspection
- 3. Color all corridors "yellow" on LSP to make them stand-out



**Corridor Doors** 

(3) <u>EP 11</u> – Corridor doors <u>latch</u> (including suite perimeter); Roller latches prohibited (LSC 18/19.3.6.3) #2







Corridor Doors

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(3) <u>EP 11</u> – Corridor doors <u>latch</u> (including suite perimeter); Roller latches prohibited

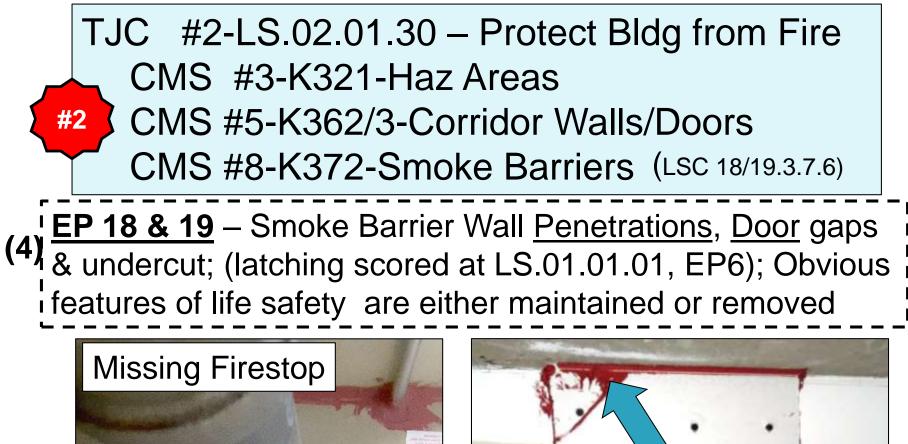
### PRIMARY OFFENDERS:

idea

- Staff taping latch or strike plate
- Staff holding/wedging door open

# **4 POSSIBLE PREVENTION IDEAS:**

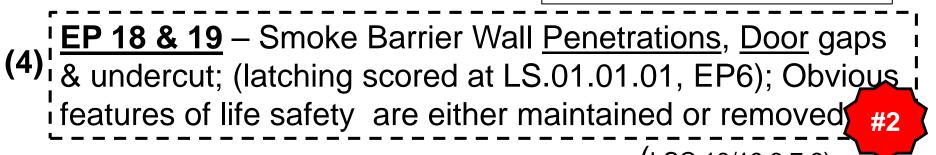
- 1. Perform periodic corridor door inspections
- 2. Train maintenance staff of what to look for
- 3. Remove unneeded closers on non-rated corridor doors
- 4. Check all vertical sliding windows for latching

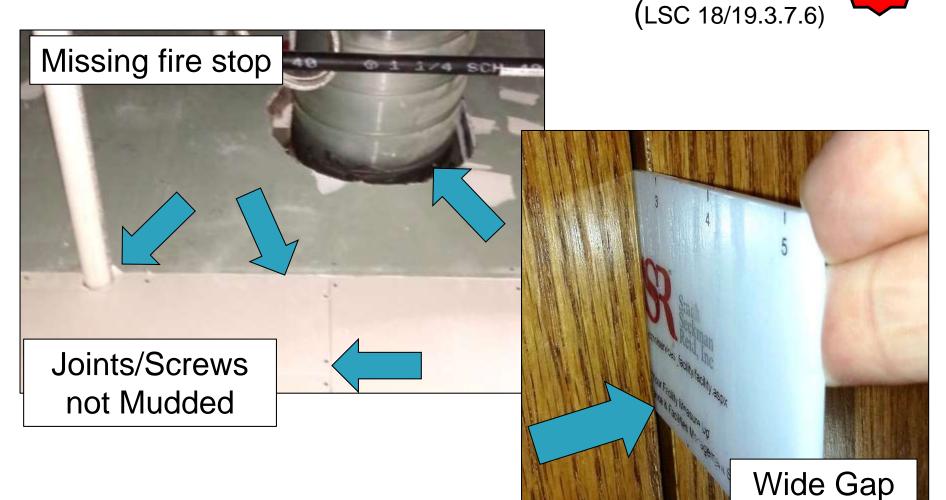




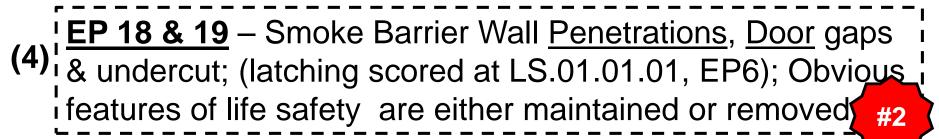


**Smoke Barriers** 





**Smoke Barriers** 





ideas

### **PRIMARY OFFENDERS**:

- Questionable drywall patches
- Improper fire stopping

# **3 POSSIBLE PREVENTION IDEAS:**

- 1. Perform your own above ceiling inspections during construction
- 2. Annual smoke barrier wall inspection
- 3. Annual smoke barrier door inspection

#3

# TJC #3-EC.02.05.01 – Utility Sys Risk Mgmt CMS (not surveyed)

(1) <u>EP 2</u> – Must have a written utility inventory

		PM Frequency						
Electrical Apparatua	Preventive Maintenance		PM Frequency					
Battery Systems	Check Voltage Check Voltage Alarm Specific Gravity and Plates		•					
Emergency Transfer Schemes	Sta Generatorsrun up Transfer	•	•					
Main Circuit Breakers	Operational Check Oil Inspection			•	•			
Main Substation Transformers	Temperature & Load Check Oil Inspection		•		•			
Motors	Bearings Grease* Ventilation						•	
Protection	Cleaned and Checked for Calibration Kilowatt-hour Meters					•		
Substation High Voltage	Incoming Lines-Dirty Atmos			•				
Unit Substations	Incomplete		0					
	Inventory		•					
	On inspection—fransformers							

(1) <u>EP 2</u> – Must have a written utility inventory

### PRIMARY OFFENDERS:

- No Inventory or not complete
- Using PM list as inventory list

# **3 POSSIBLE PREVENTION IDEAS:**

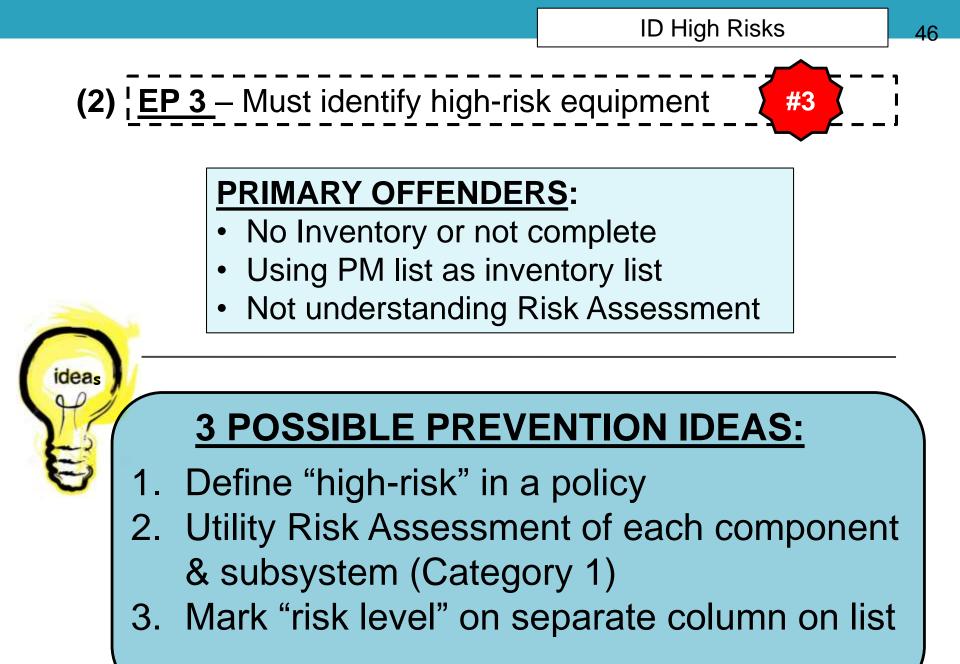
- 1. Walk around inventory of each system
- 2. Include major components
- 3. Be detailed

ideas

#3

#3

C #3-EC.02.05.01 – /IS (not surveyed)	/	ivign
<u>EP 3</u> – Must identify high-	risk equipment	- UOM -
J10 - Electric Utilities	MASTERSYSTEM	EA
(10 - Potable Water Utilities	MASTERSYSTEM	EA
20 - Non-Potable Water Utilities	AAACTEDCUCTEAA	EA
(30 - Fire Protection Water Utilities	Missing	EA
K40 - Salt Water Utilities	Hi-Risk	EA
L10 - Steam Utilities	Designation	EA
20 - High Temp Hot Water Utilities	for each item	EA
30 - Domestic Hot Water Utilities		EA
.40 - Chilled Water Utilities	MASTERSYSTEM	EA
V10 - Sanitary Sewer Utilities	MASTERSYSTEM	EA
VI20 - Industrial Wastewater Utilities	MASTERSYSTEM	EA
VI30 - Oily Wastewater Utilities	MASTERSYSTEM	EA
M40 - Storm Water Utilities	MASTERSYSTEM	EA
N10 - Natural Gas Utilities	MASTERSYSTEM	EA
120 - Propane Utilities	MASTERSYSTEM	EA
P10 - Compressed Air Utilities	MASTERSYSTEM	EA
Q10 - Multiple Commodity Utilities	MASTERSYSTEM	EA



# TJC #3-EC.02.05.01 – Utility Sys Risk Mgmt CMS (not surveyed)

(3) EP 4 – Must define inspection activities & frequencies;
 Will survey to facility policy/procedure; Primarily look at maintenance of proper pressure relationships, air-exchange rates, filtration efficiencies, RH & temperature



	Preventive Maintenance Procedure								
and the second	Equipment Nam	e LIQUID FLOW BENCH (A)	Type of PM Semi-Annual						
	Model No	LFB-1	Serial No: N/A						
ARD	Workcenter Department Facility	WC CURE Facility 5	MachineCategory: A						
	PM Est Hours:	3 Actual Hrs PM Complete	d By:						
	Preventive Maintenance Procedure								
	1. CHECK SO	THE VALVE SHOP).							
	2. CHECK OVERFLOW TANK (LOCATED UNDER THE FLOW BENCH. EMPTY AS REQUIRED (CALL FACILITIES TO REMOVE WASTE SOLVENT).								
		ILTERS (3). 2 FILTERS LOCATED IN THE S S). THE THIRD IS LOCATED BEHIND THE C	CONTROL PANEL PRIOR TO						
		METER. WESTER FILTER CORP. P/N E602	1B2C03.						
Method	&	ILTERS ON HPU. TANK MUST BE DRAINED	BELOW FILTER LEVEL.						
Frequency I	Must	FLUID POWER							
1 2		REPLACEMENT FITTINGS FOR HOSES. LE	AKING AT JUNCTIN						
be writte	n	/07							

(3) Will survey to facility policy/procedure; Primarily look at maintenance of proper pressure relationships, air #3 exchange rates, filtration efficiencies, RH & temperature

### **PRIMARY OFFENDERS**:

- Incomplete & Disorganized records
- Few Owner's manuals

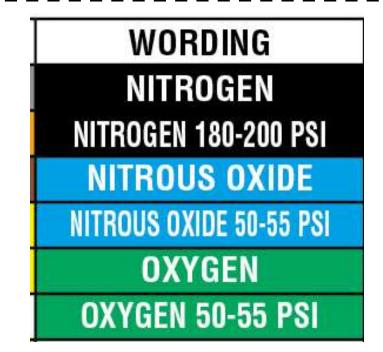
ideas

# **3 POSSIBLE PREVENTION IDEAS:**

- 1. Be methodical. Every component on Inventory has a written inspection process
- 2. Use owner manual as basis of inspection method & frequency
- 3. Supplement with code requirements

# TJC #3-EC.02.05.01 – Utility Sys Risk Mgmt CMS #7-K341-Fire Alarm Install

(4) | <u>EP 8</u> – Utility system <u>controls are labeled</u> to facilitate full or partial shutdown; includes source & main valves & switches & electrical panel directories; Fire Alarm panel circuit feed marked & electrical breaker properly identified & access restricted



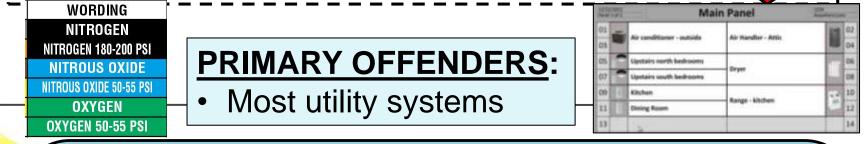
### All Controls Labeled

12/12/2012 Parsel 1 of 1		Ma	1234 Anywhere Lane		
01	-	Alexandial and a sheld a	Ale Use direct Amin	0.	
03	-	Air conditioner - outside	Air Handler - Attic	0	
05	-	Upstairs north bedrooms		0	
07	0	Upstairs south bedrooms	Dryer	0	
09	1	Kitchen	Barrow Mitching	Sec. 10	
11	1	Dining Room	Range - kitchen	1	
13		6		1	



50

(4) | EP 8 – Utility system <u>controls are labeled</u> to facilitate full
 (4) | or partial shutdown; includes source & main valves & switches & electrical panel directories; Fire Alarm panel
 circuit feed marked & electrical breaker properly
 identified & access restricted



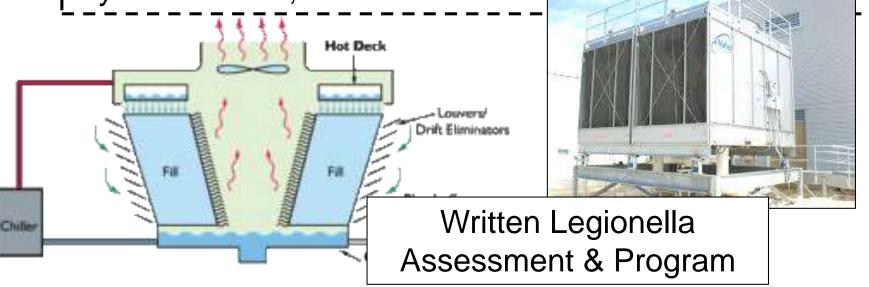
# **<u>3 POSSIBLE PREVENTION IDEAS:</u>**

ideas

- . Inspect every valve & switch, including elec panel directories, for accurate labels
- 2. Label of what downstream device/system & location it controls
- Label the upstream shut-offs name & location

TJC #3-EC.02.05.01 – Utility Sys Risk Mgmt CMS (not surveyed)

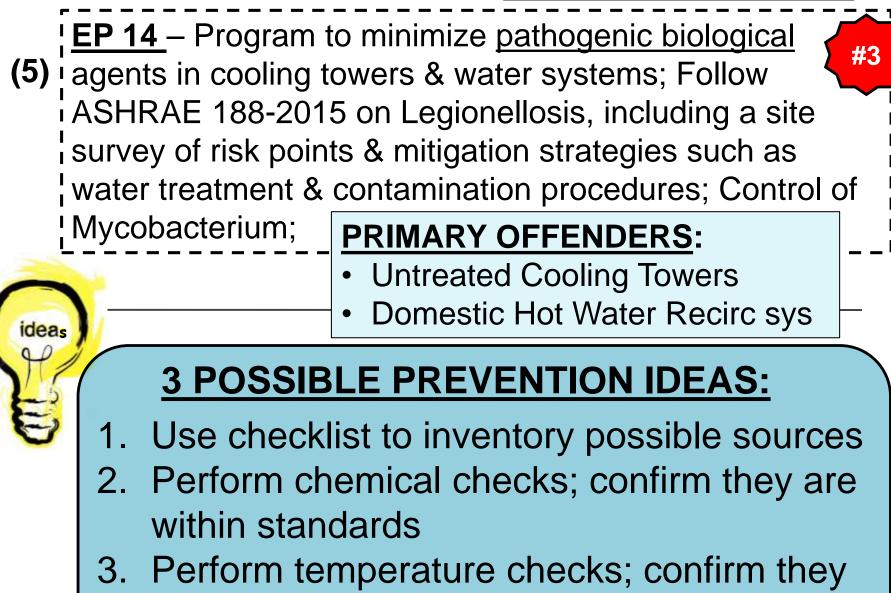
(5) <u>EP 14</u> – Program to minimize <u>pathogenic biological</u> agents in cooling towers & water systems; Follow ASHRAE 188-2015 on Legionellosis, including a site survey of risk points & mitigation strategies such as water treatment & contamination procedures; Control of Mycobacterium;



#3

**Biological Agents** 

52



are within standards

							Biologi	cal Age	nts	
		1 <u>4</u> – Program nts in coolin			-	-		-	-	#3
<b>-</b>	ASHDAE 100 2015 on Logionallogic including a cita Facility Name: INVENTORY OF SYSTEMS & COMPONENTS									
	SUR		(1) Circle eacl		ised at facility;	(2) Assess each ind evelop action plan	ivually for degr	ee of aersolizatio		int water; (3)
	wate		PLUMBING SYSTEMS			HVAC SYSTEMS			OTHER SYSTEMS	
	Myc	Typical System Components	Domestic Plumbing Fixtures	Domestic Cold Water Distr Sys	Domestic Hot Water Distr Sys	Air Conditioning Cooling Towers	Hydronic Heating Sys	Humification Sys	Fountains	Lawn Sprinkler Sys
		Pipes, valves, and fittings	x	x	x	x	x	x	x	×
	<b>\</b> _	Hot and cold water storage tanks	x	x	x	x	×	x	x	x
dea		Disinfection/Control Device	x	x	x	x	x	x	x	×
P	1	Water filters Spray nozzles Misters, atomizers, air washers	x	x		x		x	x	x
M		Open water tank				x			x	
		Water heaters			x		×			
-)		Water-hammer arrestors	x	x	x					
-		Expansion tanks			x		x			↓]
Electronic and manual faucets X						ntory	,			
		Aerators Faucet flow restrictors	x			IIIVE	ntory			
		Showerheads and hoses	x			Dee	aibla			┼───┨
		Eyewash stations	x			rus	sible			† <b>I</b> I
		lce machines	x			$\sim$				
		Hot tubs/saunas × Sources								
		Medical devices (such as CPAP machines, bronchoscopes, heater-cooler units)	x							
		Hydrotherapy devices	x							†II
										المحمد

- TJC #3-EC.02.05.01 Utility Sys Risk Mgmt CMS (not surveyed)
- (6) <u>EP 15</u> In critical care spaces, has ongoing process to monitor & maintain <u>HVAC parameters in critical spaces</u>, such as proper pressure relationships, air-exchange rates, filtration efficiencies, RH & temperature; includes OR, sterile storage, lab & spaces adjacent to these that can impact them, such as clean & soiled utility, EVS closets & adjacent non-sterile corridors

#### High Risk & Infection Control

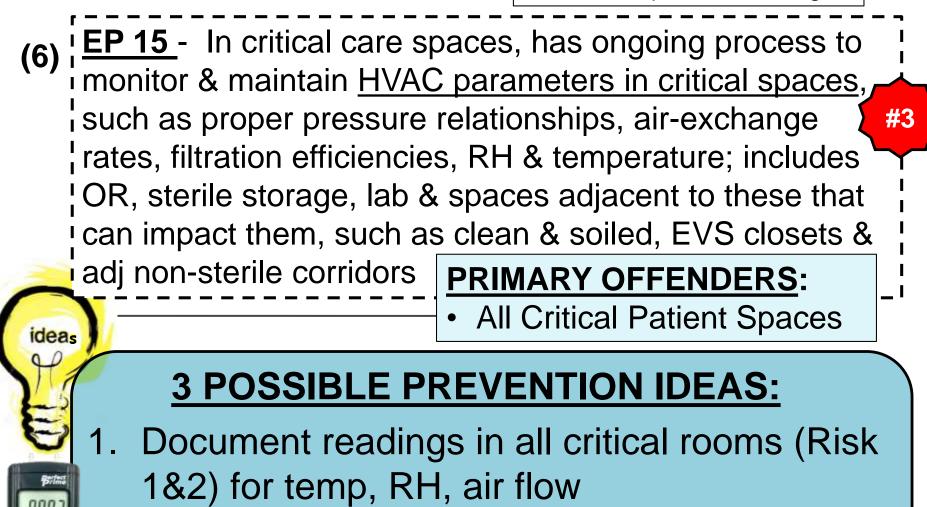
**Relative Humidity Requirements** 

• Follow ASHRAE 170-2008 guide of 20-60% RH, but make sure all equipment is compatible with this range



#3

55



- 2. Buy & use an air pressure meter (manometer)
- 3. Ensure filters are changed

# TJC #3-EC.02.05.01 – Utility Sys Risk Mgmt CMS (surveyed under MoE)

(7) EP 16 – Facility has ongoing process to monitor & maintain proper HVAC parameters in other patient care & supply space, such as pressure relationships, airexchange rates, filtration efficiencies, RH & temperature that is suitable for care, treatment & services provided in the space; includes checks for <u>door</u> held open by air pressure, odors, propped doors, self-closing devices; staff examine sterile supplies before use & contacts

facilities if space temperature or RH are inadequate

Other Patient Care & Supply Spaces

**Non-Critical Space Monitoring** 57 **<u>EP 16</u>** – Facility has ongoing process to monitor & maintain proper HVAC parameters in other patient care & supply space, such as pressure relationships, airexchange rates, filtration efficiencies, RH & temperature that is suitable for care, treatment & services provided in the space; includes checks for door held open by air #3 pressure, odor **PRIMARY OFFENDERS**: hg devices: Clean & soiled rooms supply rooms

# **3 POSSIBLE PREVENTION IDEAS:**

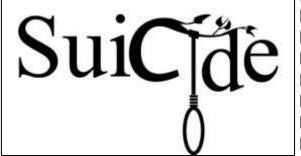
- Document readings in all patient sleep & care rooms for temp, RH, air flow
- 2. Buy & use an air pressure meter (manometer)
- 3. Ensure filters are changed

ideas

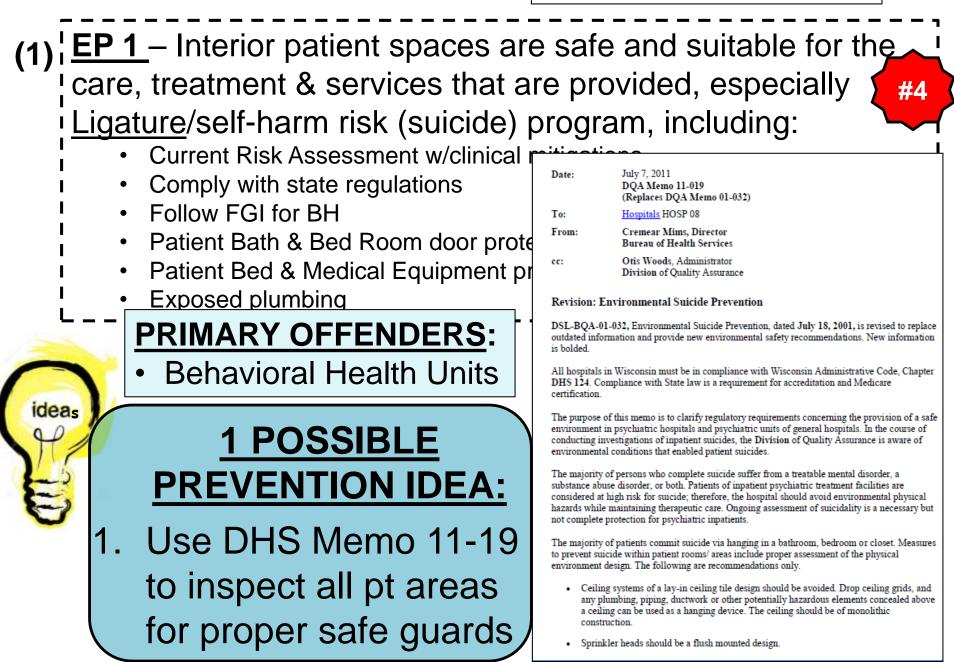
# TJC #4 - EC.02.06.01 – Safe/Functional Envir. CMS (Surveyed under A tag)

(1) <u>EP 1</u> – Interior patient spaces are safe and suitable for the care, treatment & services that are provided, especially <u>Ligature</u>/self-harm risk (suicide) program, including:

- Current Risk Assessment w/clinical mitigations
- Comply with state regulations
- Follow FGI for BH
- Patient Bath & Bed Room door protections
- Patient Bed & Medical Equipment protections
- Exposed plumbing
- Sinks, Toilets, & Shower devices
- Handrails
- Mounted items in Corridor (signs, lights, etc.)
- Suspended Ceilings
- Nurse Call cords accessible & length per risk assessment (best 4-6")
- TJC does NOT accept cameras as an alternative for one-on-one observation
- Flooring



#### Suicide Risks

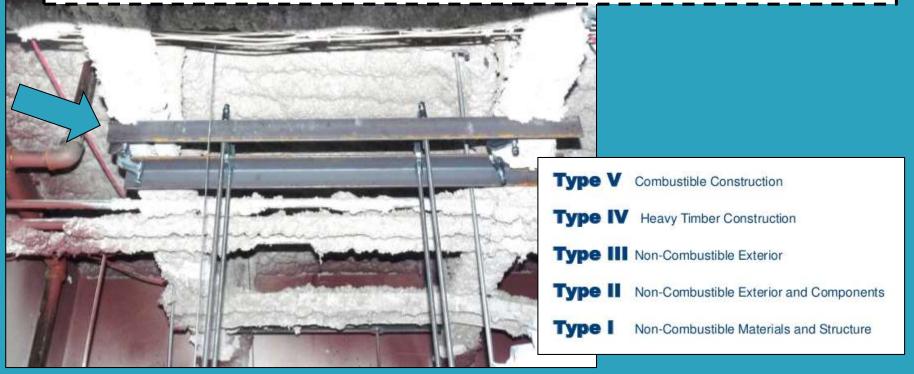


# TJC #5 - LS.02.01.10 – Gen-Bldg & Fire Protect

# CMS #34-K161-Construction Type

# (1) <u>EP 1</u> – Proper <u>construction type</u> provided for occupancy, including

- Missing fire proofing
- Not fully sprinkled when required (especially elevator mech rooms, freezers)



### (1) <u>EP 1</u> – Proper <u>construction type</u> provided for occupancy, including

Missing fire proofing

ideas

Not fully sprinkled when required (especially elevator mech rooms, freezers)

### PRIMARY OFFENDERS:

- Mechanical rooms
- Rooms with welded superstructure (OR, X-Ray)

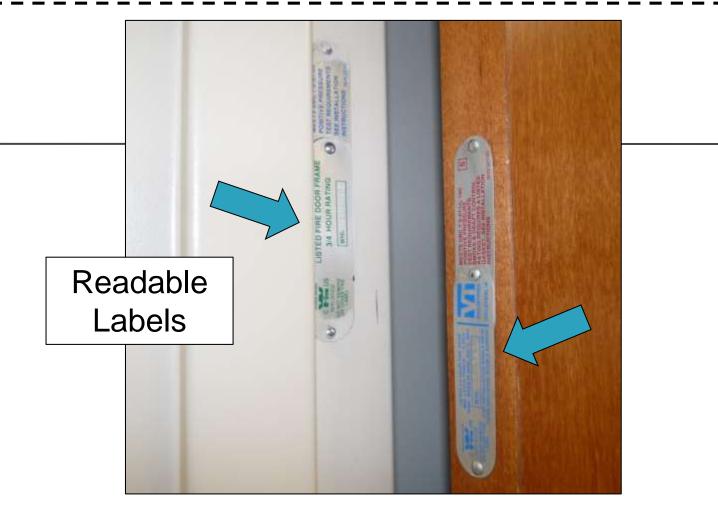
# **<u>3 POSSIBLE PREVENTION IDEAS:</u>**

- 1. Self-inspect projects prior to ceiling closure
- Carefully inspect all visible fire proofed beams & columns, especially in mechanical rooms & at rated walls
- 3. Look for issues whenever ceiling is opened

Doors & Window Rating

# TJC #5 - LS.02.01.10 – Gen-Bldg & Fire Protect CMS #34-K161-Construction Type

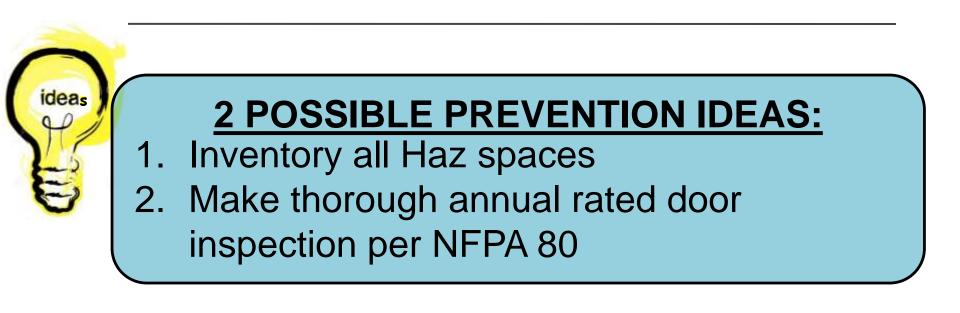
(2) <u>EP 5</u> – Appropriate door & window fire rating





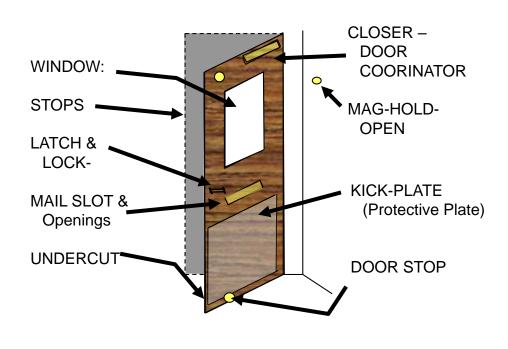
### **PRIMARY OFFENDERS**:

Hazardous Rooms, especially storage



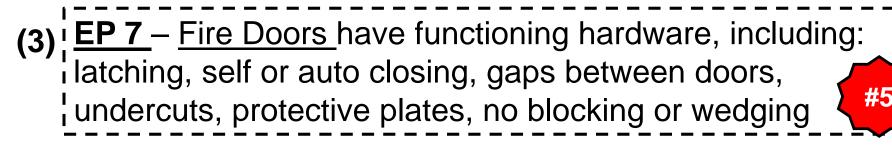
# TJC #5 - LS.02.01.10 – Gen-Bldg & Fire Protect CMS #34-K161-Construction Type

(3) <u>EP 7</u> – <u>Fire Doors have functioning hardware, including</u>: latching, self or auto closing, gaps between doors, undercuts, protective plates, no blocking or wedging



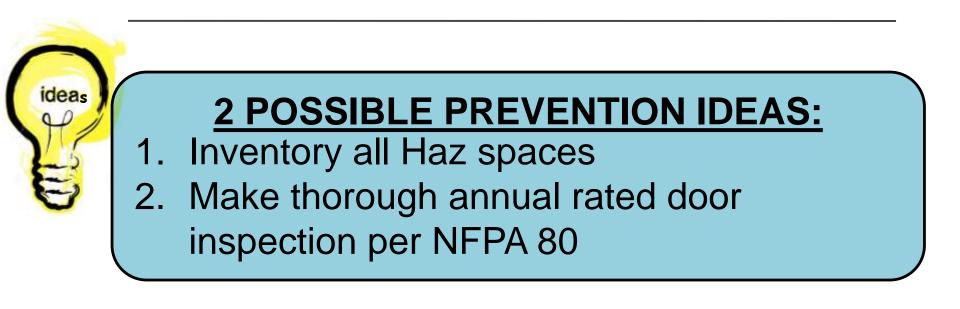


Rated Door Hardware



### PRIMARY OFFENDERS:

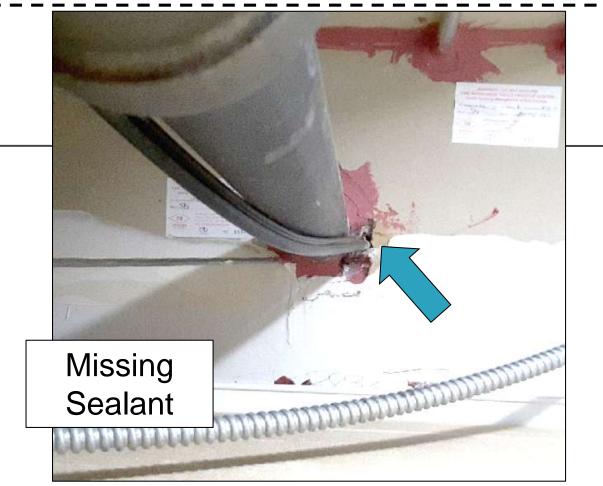
Hazardous Rooms, especially storage



**Rated Wall Penetrations** 

# TJC #5 - LS.02.01.10 – Gen-Bldg & Fire Protect CMS #34-K161-Construction Type

(4) <u>EP 10</u> – All <u>penetrations</u> are fire stopped or dampered



(4) <u>EP 10</u> – All <u>penetrations</u> are fire stopped or dampered

# PRIMARY OFFENDERS:

- Hazardous Rooms, especially storage
- Smoke Barrier Walls



# **5 POSSIBLE PREVENTION IDEAS:**

- 1. Perform your own constr pre-ceiling closure inspections
- 2. Don't accept it just because there's red
- 3. Mandate use of fire stop labels
- 4. Implement a fire stop permit program
- 5. Train all contractors on expectations

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# TJC #6 - EC.02.02.01 – Haz Material Mgmt CMS (Not Surveyed)

- (1) <u>EP 5</u> Risks of hazardous chemical are minimized for selecting, handling, storing, transporting, using & disposing, including use of PPE, emergency showers, risk assessments performed,
  - Follow OSHA recommendations on <u>eyewash</u> stations (ANSI Z358.1-2009) for placement within 10 sec travel or 55' where corrosive chemicals are used; use tepid water (with doc temperature checks), weekly flushing, annual inspection

Within 10 Second/55'

Weekly/Annual Inspect



(1) EP 5 – Risks of hazardous chemical are minimized for selecting, handling, storing, transporting, using & disposing, including PPE, emerg showers, risk assess,

- Follow OSHA recommendations on <u>eyewash</u> stations
- (ANSI Z358.1-2009) for placement within 10 sec travel
- or 55' where corrosive chemicals are used; use tepid
- water (with doc temperature checks), weekly flushing,
- annual inspection

### **PRIMARY OFFENDERS**:

Labs, Environmental, Facilities



# **4 POSSIBLE PREVENTION IDEAS:**

- 1. Inventory locations that use corrosives
- 2. Mark locations on floor plan; mark eyewash
- 3. Ensure eyewashes are located per code
- 4. Implement a weekly inspection program

# TJC #6 - EC.02.02.01 – Haz Material Mgmt CMS (Not Surveyed)

(2) <u>EP 8</u> – Manages <u>disposal risks</u> with an inventory that is
 EPA compliant, segregated by nature of hazard (toxic, ignitable (>24% alcohol), P (acute toxic), U (listed wastes), heavy metals, etc.)



Haz Mat Disposal

(2) EP 8 – Manages <u>disposal risks</u> with an inventory that is EPA compliant, segregated by nature of hazard (toxic, ignitable (>24% alcohol), P, U, heavy metals, etc.) #6

### PRIMARY OFFENDERS:

Labs, Environmental, Facilities



# **4 POSSIBLE PREVENTION IDEAS:**

- Independent Inventory & inspection of users
- 2. Designated Collection Space
- 3. Make sure all containers are labeled
- 4. Keep room orderly

TJC #6 - EC.02.02.01 – Haz Material Mgmt CMS (Not Surveyed)

(3) <u>EP 11</u> – Has permits, licenses, manifests & safety data sheets per OSHA, DOT, EPA regulations; show how fulfilling "cradle to grave" responsibility

<section-header></section-header>	
D.O.T PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX HANDLE WITH CARE!	



#6

Cradle to Grave

(3) EP 11 – Has permits, licenses, manifests & safety data sheets per OSHA, DOT, EPA regulations; show how fulfilling "cradle to grave" responsibility

## PRIMARY OFFENDERS:

• Labs, Environmental, Facilities



- 1. Log of incoming materials
- 2. Log of collected waste & disposal
- 3. Orderly filing of Manifests

# TJC #6 - EC.02.02.01 – Haz Material Mgmt CMS (Not Surveyed)

(4) <u>EP 12</u> – Haz materials & wastes have clear & legible
 <u>labels</u> (in English) for contents & haz warnings, per
 standards of OSHA Blood borne Pathogens, OSHA Haz
 Com, NFPA; including transfer & secondary containers;

Readable Labels	HEALTH HAZARD 4 Deadly 3 Extreme danger 2 Hazardous 1 Slightly hazardous 0 Normal material SPECIFIC	FIRE HAZARD Flash Points 4 Below 73° F 3 Below 100° F 2 Above 100° F not exceeding 200° F 1 Above 200° F 0 Will not burn
Biohazard Warning Labels Warning labels required on: Containers of regulated waste Refrigerators and freezers containing blood and other potentially infectious materials Other containers used to store, transport, or ship blood or other potentially infectious materials Red bages recontainers may here substituted for labels	HAZARD ACID-Acid ALK-Akali COR-Corrosive OXY-Oxidizer P-Polymerization *-Radioactive W-Use No Water CHEMICAL NAME MSDS #	Reactivity 4 May detonate 3 Shock & heat 2 Violent chemical change 1 Unstable if heated 0 Stable

Haz Mat Labels

(4) <u>EP 12</u> – Haz materials & wastes have clear & legible
 (4) <u>labels</u> (in English) for contents & haz warnings, per
 standards of OSHA Blood borne Pathogens, OSHA Haz
 Com, NFPA; including transfer & secondary containers;

#### PRIMARY OFFENDERS:

Labs, Environmental, Facilities



# **<u>3 POSSIBLE PREVENTION IDEAS:</u>**

- Review bio label method with infection prevention staff
- 2. Purchase pre-printed labels
- Independently spot inspect labels at use & storage locations

#### Door Locks & Latches

# TJC #7 - LS.02.01.20 – Means of Egress CMS #11-K211-Means of Egress

(1) EP 1 – Door latches & locks do not require a tool or key to open from the egress side, unless they meet all conditions to use one of the approved exceptions, including a clinical patient need, a special patient need, delayed egress, access control, elevator lobby, or prior AHJ approved method.



Check Egress Side (1) EP 1 – Door latches & locks do not require a tool or key to open from the egress side, unless they meet all conditions to use one of the approved exceptions, including a clinical patient need, a special patient need, delayed egress, access control, & elevator lobby

#### **PRIMARY OFFENDERS**:

Throughout facility

ideas



- 1. Annual walk-around inspection of all door operations from egress side
- 2. Challenge the need of any door that is locked from the egress side

# TJC #7 - LS.02.01.20 – Means of Egress CMS #11-K211-Means of Egress

# (1) <u>EP 13</u> – The integrity of the means of egress is maintained, including:

- Anything in the <u>corridor</u> for more than 30 minutes is storage
- Dead ends ≤ 50' long (may be used for storage if not combustible)
- Wheeled equipment permitted if (1) the unobstructed width is ≥ 5', (2) the fire plan requires removal during alarm conditions, (3) it is in use, (4) used for patient life & transport, (5) medical emergency equipment or isolation equipment
- Fixed furniture okay if anchored and has required unobstructed width



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# Conditions:

(1)

#### 18/19.2.3.5(4)

- Min 8' wide corridor (new)
- Leave min 5' clearance
- Equipment "Storage" not permitted
- Must have & apply policy to remove on alarm



Isolation Cart

- Assigned to specific Patient Room
- Precautions sign at Patient Room

Crash Cart

#### Emergency Equipment

- Must be Secure
- Follow Health checks

#### **Corridor Obstructions**

# Equipment Allowed Anytime



Do not <u>charge</u> equipment in a corridor. It 's considered "storage"

#### **Corridor Obstructions**

# (1)



# Carts & Equipment Allowed ONLY When In Use





# <u>"In-use" not defined</u>

Apply CMS 30 min rule

- Using staff nearby
- Moved every 30 min
- Not plugged in
- Must remove on alarm

Copyright, LLSC Aug 2017

(1) 4 Sets of Conditions for Furniture in a Corridor

#### 1. Width Conditions

- Corridor must be at least 8' wide
- Final clear width must be at least 6' wide

#### 2. Protection Conditions

- Corridor smoke detection of compartment
- Or Space has direct supervision & Building fully sprinkled (quick response)

#### 3. Furniture Conditions

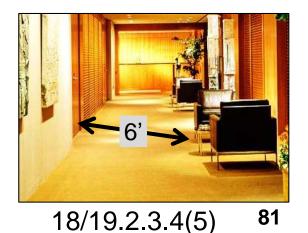
- Furniture must be attached to wall or floor
- All on same side of corridor
- Grouping: Max 50 SF each; Min 10' apart

## 4. Building Equipment

 No obstruction to pull stations, building service equipment, or fire extinguishers

# Furniture





#### **EP 13** – The integrity of the means of egress is **(1)** maintained, including:

- Anything in the corridor for more than 30 minutes is storage
- Dead ends  $\leq$  50' long (may be used for storage if not combustible)
- Wheeled equipment permitted if (1) the unobstructed width is  $\geq$  5', (2) the fire plan requires removal during alarm conditions, (3) it is in use, (4) used for patient life & transport, (5) medical emergency equipment or isolation equipment

ideas

# Fixed furnity **PRIMARY OFFENDERS**:

unobstructed width

Throughout facility

# **3 POSSIBLE PREVENTION IDEAS:**

- 1. Frequent walk-around inspection of all corridors & talking to staff/managers
- 2. Anything plugged in is questionable
- 3. Challenge the need of any item that is kept in the corridor

#7

use

# TJC #8 - EC.02.05.05 – Utility Sys Inspection CMS #1-K353-Sprinkler Testing #6-K511-Gas & Elec Utilities

#### **<u>EP 2</u>** – Utility system components are tested <u>before initial</u>



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FIRE ALARM SYSTEM

WERE RELEASE

(1) EP 2 – Utility system components are tested before initial use

#### PRIMARY OFFENDERS:

- Small construction projects
- New building service equipment

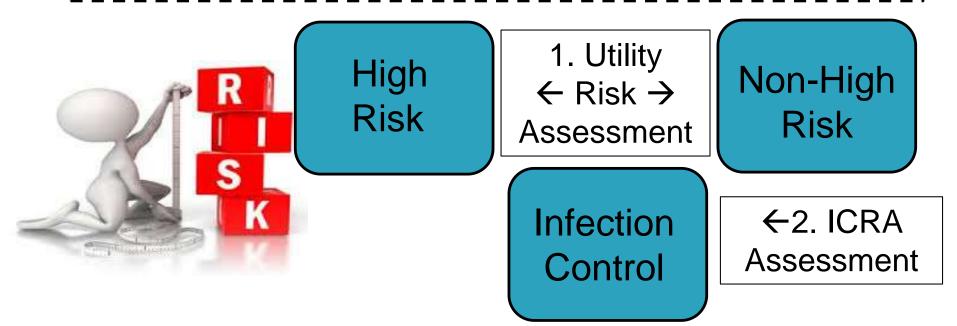
# **2 POSSIBLE PREVENTION IDEAS:**

- 1. File DQA Construction Completion documents under EP 2 (outlets, fire alarm, sprinkler, nurse call, damper, etc.)
- 2. Use same form for small projects

ideas

# TJC #8 - EC.02.05.05 – Utility Sys CMS #1-K353-Sprinkler Testing #6-K511-Gas & Elec Utilities

(2) <u>EP 4-6</u> – Utility system components are inspected, tested,
 & maintained based on a <u>risk assessment</u> that classifies
 components as high risk, infection control & non-high risk;
 Corrective action is taken in a timely period



<u>EP 4-6</u> – Utility system components are inspected, tested,
 (2) & maintained based on a <u>risk assessment</u> that classifies
 components as high risk, infection control & non-high risk;
 Corrective action is taken in a timely period

#### **PRIMARY OFFENDERS**:

Throughout facility

ideas

- Perform a NFPA 99 Utility Risk Assessment on all components on the inventory list (1=High; 2-4=Non-High Risk)
- 2. Work with infection control to define those components that impact infection risk

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TJC #8 - EC.02.05.05 – Utility Sys Inspection CMS #1-K353-Sprinkler Testing #6-K511-Gas & Elec Utilities

# (3) <u>EP 7</u> – Facility meets all NFPA 99-2012 <u>Electrical & HVAC</u> requirements, including:

- Critical branch circuits
- HVAC per manufacturer's instructions for medial supplies & equipment
- Smoke control systems in windowless anesthesia areas to prevent recirculation
- Operating Rooms are considered wet locations (mandatory isolated power or ground fault circuit interrupters) unless a risk assessment determines otherwise
- Hospital-grade receptacles at patient bed & sedation area tested at installation, replacement, or serving
- Tamper-Resistant outlets or covers in pediatric patient rooms, baths, play rooms & activity rooms
  Emergency receptacles have a distinctive color or marking

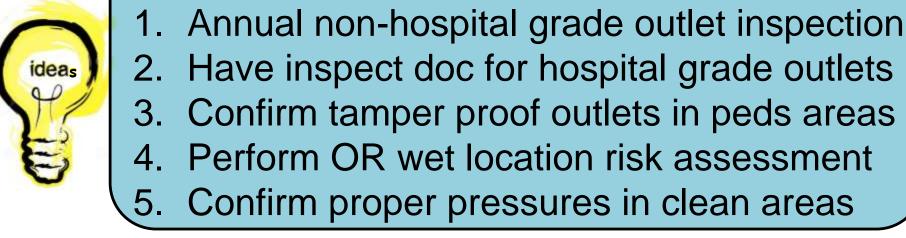
88

# (3) EP 7 – Facility meets all NFPA 99-2012 Electrical & HVAC requirements, including:

- Critical branch circuits
- HVAC per manufacturer's instructions for medial supplies & equipment
- Smoke control systems in anesthesia areas prevent recirculation
- Operating Rooms are considered wet locations
- Hospital-grade receptacles at patient bed & sedation area tested at installation, replacement, or serving

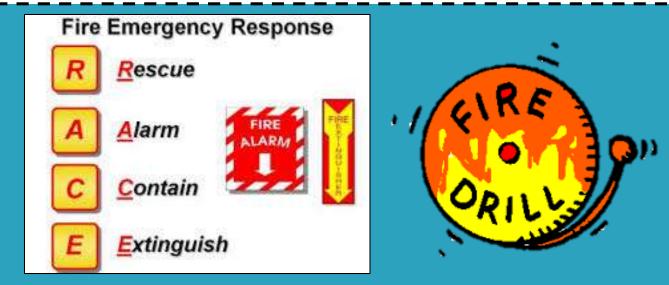
#### **PRIMARY OFFENDERS**:

Throughout facility



**#9** 

(1) <u>EP 1</u> – Drills are conducted <u>once per shift per quarter in</u> each health care occupancy and quarterly in ambulatory health occupancies; evacuation of patients is not required during drills; drills between 9 pm & 6 am may use an alternate method to notify staff rather than using audible alarms



(1) each health care occupancy and quarterly in ambulatory health occupancies; evacuation of patients is not required during drills; drills between 9 pm & 6 am may use an alternate method rather than audible alarms

#### **PRIMARY OFFENDERS**:

Throughout facility

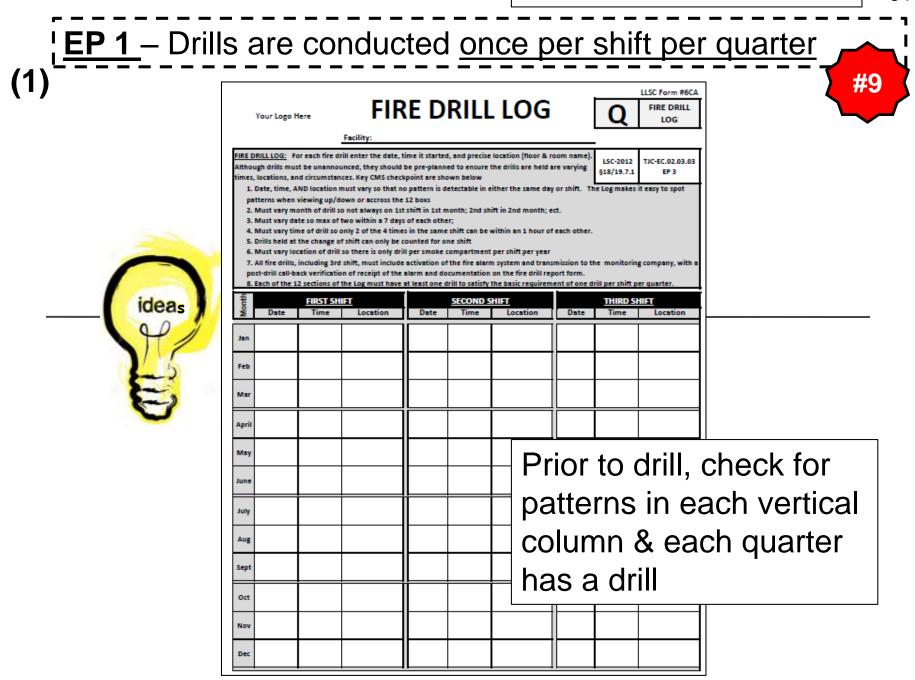
ideas

# **<u>3 POSSIBLE PREVENTION IDEAS:</u>**

- Run drills in 1<sup>st</sup> half of month to leave room for adjustments
- Record drills on a log that shows date, time & location. Consult to avoid patterns
- Confirm FA sys can deactivate audible alarms on 3<sup>rd</sup> shift

#### Fire Drills

٩



**#9** 

#### TJC #9 - EC.02.03.03 – Fire Drills CMS #2-K712 – Fire Drills

(2) EP 3 – At least 50% of drills are unannounced; all are held at unexpected times, under varying conditions, include a fire alarm signal transmission, and simulation of emergency fire conditions



(2)  $\left| \frac{\text{EP 3}}{\text{at unexpected times, <u>under varying conditions</u>, include a fire alarm signal transmission, and simulation of the emergency fire conditions$ 

## **PRIMARY OFFENDERS**:

Getting into a pattern



- 1. 100% of drills must be unannounced
- 2. Review log monthly to look for patterns of time, date, or location
- 3. Use various methods to simulate a fire
- Every drill must include an alarm transmission



#10

(1)

TJC

(not in top 10) CMS

#4-K345-Fire Alarm Testing

The fire alarm system is inspected & tested per:

- Code required frequencies
- Code required elements

INSPECTION TOPIC & FREQUENCY			NFPA CODE	TJC CODE
3A - HYPERBARIC FIRE ALARM- WEEK	LY	Ν	FPA 99-2012,§14	
3B - ALARM TRANSMISSION-DAILY		Ν	FPA 72-2010,§14	
3C - ALARM TRANSMISSION-WEEKLY		Ν	FPA 72-2010,§14	
3DA - FIRE ALARM - MONTHLY	Don't Miss	•	FPA 72-2010,§14	
3DB - FIRE ALARM - QUARTERLY	Any		FPA 72-2010,§14	EC.02.03.05, EP 01
3DC - FIRE ALARM-SEMI ANNUAL	7 (11)		FPA 72-2010,§14	EC.02.03.05 EP 01
3DE - FIRE ALARM - ANNUAL		Ν	FPA 72-2010,§14	EC.02.03.05 EP 03
3DF - DETECTOR SENSITIVITY- 2-Yr		Ν	FPA 72-2010,§14	
3E - CARBON MONOXIDE- 10 Yr		N	FPA720-2012,§8	

(1) The fire alarm system is inspected & tested per: • Code required frequencies

- Code required elements

#### **NFPA 72 REVISION ON FREQUENCY TOLERANCE** (NFPA 72, 3.3.106)

*Weekly* = 52 times per year, once per calendar week.

*Monthly* = 12 times per year, once per calendar month.

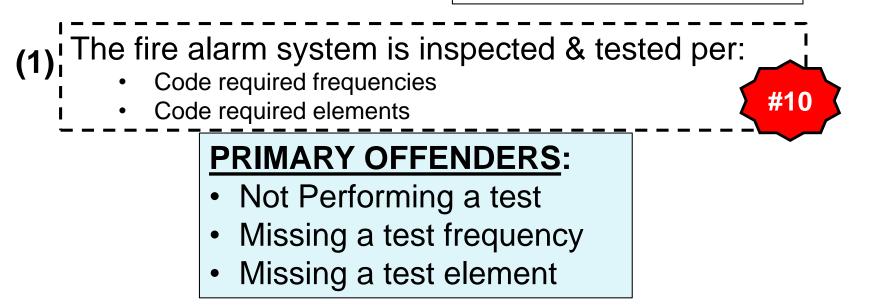
**Quarterly** = 4 times per year with a min of 2 months, max of 4 months

**Semiannual** = 2 per year with a min of 4 months, max of 8 months

**Annual** = Once per year with a min of 9 months, max 15 months

Only applies to Fire Alarm Sys





# ideas

- 1. Use the NFPA 72 example form as a guide
- 2. Do not leave anything blank
- 3. Do not delete any element; if don't have it then just say that
- 4. Make sure all devices are tested

# TJC (not in top 10) CMS #9-K324-Cooking Facilities



(2) Cooking must be performed in a room under a hood that is equipped with a fire suppression sys. The hood must be inspected semi-annually, as well as the suppression system.



(2) Cooking must be performed in a room under a hood that is equipped with a fire suppression sys. The hood must be inspected semi-annually, as well as the suppression #10

# PRIMARY OFFENDERS:

ideas

- Food Svc responsible for inspections
- Lack of pre-scheduling work

- 1. If Food Svc schedules inspections, have report sent immediately to Facilities
- 2. Set up a standing order for semi-annual cleaning & inspection

Fire Extinguishers



## (not in top 10) #10-K355-Fire Extinguishers

(3) Access to fire extinguishers must not be restricted and units must be inspected at no more than 30 day intervals.



(3) Access to fire extinguishers must not be restricted and unit must be inspected at no more than 30 day intervals.

#### **PRIMARY OFFENDERS**:

- Throughout facility
- Kitchens

ideas

# **<u>3 POSSIBLE PREVENTION IDEAS:</u>**

- 1. Monthly inspector should use zero tolerance on access to extinguisher
- 2. Inspect at 30 day or less intervals
- 3. Post the 8 inspections checkpoints on the tag or in the cabinet

10 0

#10

←	HOS	SPIT	ALS	$\rightarrow$

## **NURSING HOMES**

1

THE JOINT COM	MISSION		CMS (WIS DQA)	
#1-LS.02.01.35–Fire Su	ppression Sys		#1-K353-Sprinkler Testing #12-K351-Sprinkler Install	
#2-LS.02.01.30–Protect Bldg from Fire			#3-K321-Haz Areas #5-K362/3-Corridor Walls & Door #8-K372-Smoke Barriers	
#3-EC.02.05.01–Utility Sys Risk Mgmt #4-EC.02.06.01–Safe & Functional Envir.			(not surveyed) #7-K341-Fire Alarm Install	
#5-LS.02.01.10–Gen Bldg & Fire Protect.			#34-K161-Construction Type	
#6-EC.02.02.01–Hazardous Mtl Mgmt			(not surveyed)	
#7-LS.02.01.20–Means of Egress			#11-K211-Means of Egress	
#8-EC.02.05.05–Utility System Inspect.			#1-K353-Sprinkler Testing #6-K511-Gas & Elec Utilities	
#9-EC.02.03.03–Fire Drills			#2-K712 – Fire Drills	
(Not in top JC 10)	Not in top JC 10) #4-K345-Fire Alarm #9-K324-Cooking Fa		0	



December 14, 2017 "Lunch & Learn" Webinar

# **TOP 10 CITES**

