



Optimizing health care facilities



justask

CLARIFICATION ON HEALTH CARE CODE COMPLIANCE

Idaho Society for Healthcare Engineers

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a personal membership group of the American Hospital Association
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Disclaimer

The responses and interpretations are an explanation of a specific provision of a code, standard or guideline. While every effort has been made to ensure its accuracy and reliability, it is advisory and provided for informational purposes only.

For formal interpretations please submit your question to the code/standard development organization for an official interpretation

Questions?

Christmas Decorations

I'm wondering if there is an acceptable exception that allows decorations to be sprayed with a fire retardant (in a can, picked up from the local store), and therefore passes allowable fire codes. Decorations such as custom built/decorated artificial trees.

NFPA 101-2012, 18/19.7.5.6(1). it allows the use of treated decorations.

Allowing this type of use will require documentation and exposure to being cited.

Your policy should dictate whether or not this is allowed in your facilities.

Fire Watch in Business Occupancies

- Is a fire watch required in buildings classified as Business Occupancies after hours or on weekends if there are no occupants in the building and it is locked and secured?

For example, lets say you have an issue with your fire sprinkler system in which a repair cannot be completed within the 10 hour timeframe allowed, and your fire alarm system is still in working order.

- 25 – Evacuate OR Fire Watch (others)
- “APPROVED fire watch”
- The fire department has been notified

Psychiatric Sprinkler Heads

We have an adult psychiatric floor where we've had the sprinkler head broken in our seclusion room twice in 2 months. They are anti-ligature heads. We are exploring options to replace these with some that are more durable. What is everyone using in their psych spaces and are they proven to work?

- As a surveyor focused on:
 - Verifying sprinkler coverage
 - Verifying anti-ligature

Designated Smoking Areas

Those that have, or have had, a designated smoking area, what are you using to comply with the code?

- NFPA 101-2012 18/19.7.4 (1) thru (6)
 - Prohibited if flammable liquids, combustible gases or oxygen in room
 - Signage
 - Not responsible patients prohibited
 - Direct supervision
 - Noncombustible ashtray
 - Metal container with self-closing cover

Hood Cleaning

- What are the requirements in regards to cleaning kitchen hoods – are they required to be cleaned semi-annually?
- NFPA 96, 11.3 only requires the inspection for grease buildup semi-annually.
 - Section 11.6 requires that if the inspection determines that the hood is found to have grease buildup, then it needs to be cleaned.

Decommissioning Laboratory Hoods

In decommissioning a laboratory fume hood, to what extent must the system be removed? Hood cabinet, ductwork, exhaust fan?

- If there is a potential future need for the fan:
 - Implement a LO/TO procedure on an energized devices within the system
 - Properly document the decommissioning within the asset management system
- If there is no potential future need ideally the hood and ductwork and fan should be removed and the roof repaired
- If the fan serves multiple hoods, remove as much of the ductwork necessary and rebalance the system

RPT's and UL 2930

I just heard that CMS has recently approved the use of UL 2930 Listed power strips in patient care areas. Is this true? I have not seen anything official from CMS.

- UL 2930 is not a CMS approved standard
- CMS Requires the following for RPT's
 - Minimum No. of receptacles
 - RPT's for patient care-related equipment/Patient Care Vicinity
 - UL 1363A or UL 60601-1
 - RPT's for non patient care-related equipment/Outside Patient Care Vicinity
 - UL 1363
 - Precautions as required by the LSC

SPD Temp/Humidity Requirements

We recently received a finding for low temp in the decon areas during a Joint Commission mock survey. I know that AAMI, ARON and ASHRAE Have addressed this in the 2013 addendum H version of the code. Has anyone been successful at addressing this for existing SPD's?

- It depends – what is required?
 - NFPA 99 2012 references 2008 Edition of 170
 - ASHRAE/ASHE 170 is a DESIGN Standard – not Operations
 - What is your operational requirement?
 - If 170
 - Temperature Requirement is 72-78
 - If another standard – AAMI ST79, AORN Guideline, FGI?
 - Must adhere to these requirements
 - Create HVAC System Policy
 - See 2015 Joint Interim Guidance – AAMI, AORN, APIC, ASHE, ASHRAE, FGI

Class 155 Transformer Exceptions

Is it typical or normal for dry transformers to have Class 155 or higher insulation, such that the exceptions in NFPA 70 450.21 would often or usually apply, or whether it's unusual, such that the exceptions would usually not apply?

- Is an allowable exception in the code
- Needs to be directed to the manufacturer
 - Include requirement in specification/contract documents
 - Verify with manufacturer

Weather Alert Policy

As part of our Weather Alert Policy when we are under a tornado warning we have staff relocate to designated safe areas within the facility. In December we had two separate tornado warnings in one day, and staff followed procedures. While still under the tornado warning, it was noted that persons were still arriving for appointments. As of now we do not have a process to address persons arriving and getting them to safe areas. We are asking how other facilities are addressing this, or any thoughts you may have.

- Rely upon the National Weather Service announcements to inform patients whether or not it is safe to leave their homes

Electrical Equipment in Patient Care Area

We are in the midst of our survey, The LS surveyor has said that any electrical equipment in the patient care area needs to be hospital grade. Specifically we have refrigerators within 6' of the bed that are residential dorm type.

- NFPA 99 Health Care Facilities Code 2012 Edition 10.4 Nonpatient Electrical Appliances and Equipment.
 - 10.4.2.1 Nonpatient care–related electrical equipment, that contacts patients, shall be visually inspected
 - 10.4.2.2 Not in proper order shall be removed
 - 10.4.2.3 Household or office appliances without grounding conductors in shall be permitted if not within the patient care vicinity. Double-insulated appliances permitted in patient care vicinity.

Bronchoscopy Lab Requirements

We have a Bronch Lab procedure room that was recently constructed last year. It is for a new kind of Bronch diagnostic for cancer patients that are screened ahead of time for TB. Bronch Lab's are supposed to be negative pressure at 12 ACH. However, due to this being for cancer patients that are screened for TB, it is setup for positive pressure.

- This is a great example of the importance of working with multidisciplinary teams
 - The code does not address this situation
 - Best practice would be to include an anteroom to the bronchoscopy lab
 - This would allow the lab to remain negative to the anteroom while the anteroom could be positive to the adjacent space

Fire Drill Frequency

We have always been told that we need to do a fire drill for all 3 shifts even though we only work 2 (12 hrs.) shifts. During a recent Joint Commission review, we were told that we only need to do 8 drills per year and not 12 since we only have 2 shifts. Is this new guidance? NFPA 101 just says quarterly per shift.

- NFPA 101 – Once per quarter per shift
- Is everyone on 2 12 hour shifts?

Cannabis Disposal

What is your hospital's policy on handling and storing patients' cannabis products?

- Need to research state requirements
- Need to establish an organization policy
- Need to follow the policy

Scale Calibrating

- Does anyone know of any standards, code, or guidelines for patient scale calibrations?
 - Medical Equipment Management Plan
 - Scales are Patient Equipment
 - Manufacturer's Requirements

Non-refrigerated Pharmaceuticals

We recently had a survey (DNV) and they mentioned we need to monitor our medication rooms with non-refrigerated pharmaceuticals. I can't seem to find the black and white on this subject. Can anyone point me in the right direction?

- ASHRAE/ASHE 170 – 2008 (CMS adopted edition)
 - Pharmacy:
Positive, 2 OA, 4 ACH
- ASHRAE/ASHE 170 – 2021
 - Medication Room (Added in 2013 edition)
2OA, 4 ACH, Unoccupied Turndown, Merv-8, Max 60% Rh, 70-75° F

ICRA Regulations

I am curious as to if anyone knows where to find the requirements for construction companies to follow ICRA regulations.

- NFPA 99, 2012 Edition Section 9.3.1 Requires HVAC systems to meet ASHRAE/ASHE Standard 170, 2008 Edition
- Section 8.4 of 2008 ASHRAE/ASHE Standard 170 Requires “Prior to beginning modifications or remodeling of HVAC systems in an existing facility, an owner shall conduct an ICRA”
- FGI also requires the ICRA in 1.2-3.2 so if adopted by State...
- ASHE Recommends ICRA's for all construction, renovation or maintenance work
 - ICRA 2.0 available via <https://www.ashe.org/icra2>
 - E-learning program available

Space Heater Requirements

Has TJC issued any waivers on portable space heaters recently? Ref: NFPA 101, (2012) Chapter 19.7.8, Space heaters shall be prohibited in all health care occupancies (smoke compartments) . Since TJC is still using the 2012 version of NFPA 101, later versions that would allow it in offices and nurses stations would not be allowed correct?

- Minor differences between 2012 and 2021
- NFPA 101 does allow some use in health care occupancies
- Joint Commission and local requirements are normally the key driver

Key Accountability

Does anyone have a good system for key accountability. We have an old key box but the tracking system for who has what keys is not good. I have no way to really tell who has what keys and such.

- Need to start with a policy
 - Needs to be detailed
 - Needs to be approved
- Variety of Key Management Systems
 - Example of key cabinet system

Contact Information

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