



EHSSSENTIALS 2016

Environmental, Health & Safety Symposium for Healthcare

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**Stanford University
Medical Center**

Palo Alto, CA



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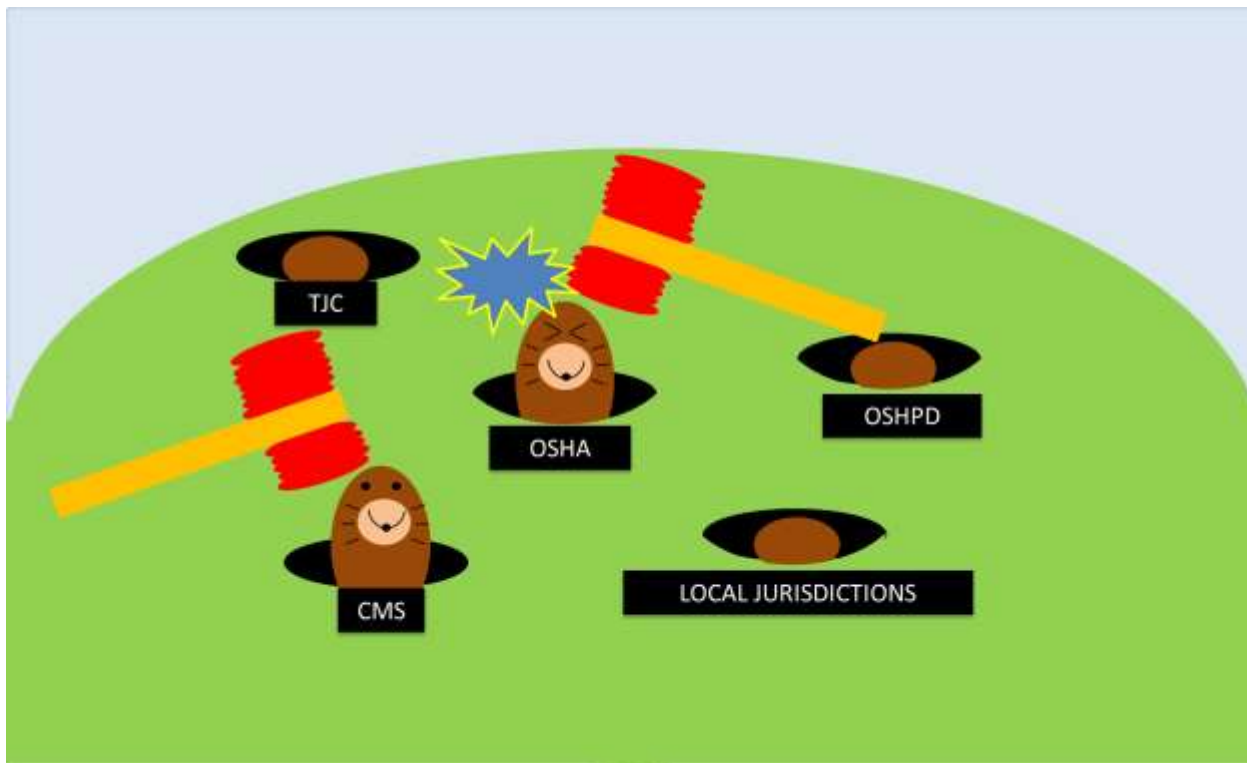
Fire Protection & Life Safety Planning for Overlapping Regulatory Jurisdictions

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REACTIVE APPROACH

Presentation Topics

- Regulatory jurisdictions impacting health care facilities
- Primary codes and regulations
- Strategies for proactive fire protection & life safety planning

The Joint Commission (TJC)

- TJC on Accreditation of Healthcare Organizations is an independent, not-for-profit organization
- Accreditation through facility & organizational surveys
- Elements of Performance references:
 - NFPA 101-2000, *Life Safety Code*[®] (LSC)

Centers for Medicare & Medicaid Services (CMS)

- CMS is part of the U.S. Department of Health and Human Services
- Surveys to support certifications
- 81 FR 26871 Final Rule effective 07/05/2016
 - NFPA 101-2012, *Life Safety Code*® (LSC)

Office of Statewide Health Planning and Development (OSHPD)

- State of California agency
- Building permits & construction observations
- Title 24 California Building Standards Code
 - California Building Code (2016 edition effective 01/01/17)

California Fire Marshal

- Represented by local Fire Departments
- Fire permits, acceptance tests, and annual inspections (varies by Fire Department)
- Title 24 California Building Standards Code
 - California Fire Code (2016 edition effective 01/01/17) with local amendments

OSHA

- California Department of Industrial Relations
- Retroactive enforcement (inspections or after incidents)
- Title 8 California Code of Regulations (CCR)

Comparison of Agency Regulations

Regulatory Agency	Ambulatory Definition (Number of outpatients incapable of self-preservation)	Patient Sleeping Suite Maximum Size (Alternative corridor access)	Outside Windows for Patient Sleeping Rooms
The Joint Commission	Four or more patients	5,000 ft ²	No requirement
CMS	Any patient	Up to 10,000 ft ²	All patient sleeping rooms
OSHPD	More than five	5,000 ft ²	No requirement

Alternate Compliance

- TJC grants through Statement of Conditions™ Plan For Improvement, based on Life Safety Code®
- CMS categorical waivers through full compliance with appropriate code reference
- OSHPD Alternate Materials, Designs, Tests and Methods of Construction

Proactive Approach Fundamentals

- Regulatory compliance is a necessary, but not sufficient condition to achieve adequate safety
- Regulations should never be used to direct facility design or operations
- Regulatory compliance and safety are business decisions

Mission-Critical Stakeholders

- Design and Construction (Expansion)
- Facility Maintenance (Operations)
- Nurses (Patient Care)
- Executive Management (Funding)

Risk Identification Strategies

- Identify mission critical system weak spots
- Review system and maintenance documentation
- Interview maintenance & operation personnel
- Look for near miss events

Stress Tests

- Automatic Sprinkler Design & Coverage
- Fire/Smoke Dampers Installation & Testing
- Arc Flash Safety Program & Work Permits
- Primary & Secondary Electrical Supply Separation
- HVAC Balancing and Maintenance

Risk Mitigation Strategies

- Partner with stakeholders
- Integrate operation and protection programs
- Communicate noncompliance items
- Prioritize system deficiency corrections

Fire Protection & Life Safety Planning

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