

# ASCs & LSC

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# NFPA 101 Life Safety Code®

- Consensus standard registered to the National Fire Protection Association
  - Construction, protection, and occupancy features necessary to **minimize danger to life from the effects of fire, including smoke, heat, and toxic gases created during a fire.**
  - Criteria for the design of egress so as to allow **prompt escape from buildings**
  - Protective features and systems, building services, operating features, maintenance activities, and other provisions in recognition that **achieving an acceptable degree of life safety depends on additional safeguards**
  - **Non-fire emergencies**
- Not a legal code
  - Not published as an instrument of law
  - No statutory authority in its own right
  - Adoption into law by those empowered to do so

## Revised on a three year cycle

**2000 (Version used by CMS)**

2003

2006

2009

**2012 (forecast CMS approval 2013/2014)**

2015 (in process)



# Ambulatory Health Care Occupancies

## **Chapter 20 New Ambulatory Health Care Occupancies**

## **Chapter 21 Existing Ambulatory Health Care Occupancies**

- 21.1 General Requirements
- 21.2 Means of Egress Requirements
- 21.3 Protection
- 21.4 Special Provisions
- 21.5 Building Services
- 21.6 Reserved
- 21.7 Operating Features



<http://www.cms.gov/Medicare/CMS-Forms/CMS-Forms/Downloads/CMS2786U.pdf>

- DEPARTMENT OF HEALTH & HUMAN SERVICES  
CENTERS FOR MEDICARE & MEDICAID SERVICES
- FIRE SAFETY SURVEY REPORT — AMBULATORY  
SURGICAL CENTERS (ASC)
- 2000 CODE
- OMB No. 0938-0242
- Form CMS-2786U (10/08)



[https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap\\_l\\_ambulatory.pdf](https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap_l_ambulatory.pdf)

- State Operations Manual, Appendix L - Guidance for Surveyors: Ambulatory, Surgical Centers

LET THEM IN!!!

- Should an individual or entity (ASC) refuse to allow **immediate access** upon reasonable request to either a State Agency (SA) or CMS surveyor, the Department of Health and Human Services Office of Inspector General (OIG) **may exclude the ASC from participation in all Federal healthcare programs** in accordance with 42 CFR 1001.1301. If a surveyor intends to make a request for immediate access with the threat of possible exclusion for non-compliance, the SA must first contact the CMS Regional Office, which must then contact the OIG Administrative and Civil Remedies Branch at 202-619-1306

## Exits

- At least two exits, located remote from each other are provided for each floor or fire section of the building.
- Rooms or suites of rooms of more than 2,500 sq. ft. have at least two exit access doors located remote from each other.
- Dead-end corridors do not exceed 50 ft. (Note: A common path of travel for the first 25 ft. is permitted.)
- Travel distance between any room door required as exit access and an exit does not exceed 100 ft. The travel distance between any point in a room and an exit does not exceed 150 ft. (Note: In approved automatic sprinklered buildings, the travel distances may be increased by 50 ft.).
- At least 50 percent of the required exit capacity from upper floors discharges directly to the exterior of the building
- Designated aisles, corridors, passageways, and exitways are provided with illumination in accordance with section
- Emergency illumination is provided
- Exits and ways of travel thereto are marked
- Door of patient treatment, diagnostic or recovery rooms arranged to provide a clear width of not less than 32 inches and existing 34 inch door.
- Exit and exit access doors are at least 34 inches wide.



## Laboratories

- Laboratories that are considered a severe hazard shall be protected in accordance with NFPA 99.
- Ventilating Systems shall comply with NFPA 101.
- Fume hoods shall be in accordance with NFPA 99
- Emergency Shower fixed facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use. Fixed eye baths shall be designed and installed to avoid injurious water pressure shall be in accordance with NFPA 99.
- Flammable and combustible liquids used from and stored in approved containers shall be in accordance with NFPA 30, Flammable and Combustible Liquids Code, and NFPA 45, Standard on Fire Protection for Laboratories Using Chemicals. Storage cabinets for flammable and combustible liquids shall be constructed in accordance with NFPA 30, Flammable and Combustible Liquids Code, NFPA

## Laboratories

- Corridors for exit access are at least 44 inches wide.
- Procedures for laboratory emergencies shall be developed.
  - Alarm actuation,
  - Alarm evacuation,
  - Alarm Equipment shutdown procedures
  - Detailed plans for control operations by an emergency control group within the organization or a public fire department
  - Controlling chemical spills
- Continuing safety education and supervision shall be provided, incidents shall be reviewed monthly, and procedures reviewed annually.

## Emergency Power

- Where general anesthesia or life support equipment is used, an emergency power system is provided in accordance with NFPA 99.

## Vertical Opening Protection

- Vertical openings such as stairways, elevator shaftways, escalators, and building service shaftways are enclosed in accordance (Note: Some exceptions are permitted.)
- Any door with a required fire protection rating, if held open, is arranged to close automatically by the actuation of the manual fire alarm system and either smoke detectors arranged to detect smoke on either side of the opening or a complete automatic sprinkler system.

## Hazardous Area Protection

- Hazardous Area separated from other parts of the building by fire barriers have **at least one hour fire resistance rating** OR such areas are enclosed with partitions and doors and the area is provided **with an automatic sprinkler system**.
- High hazard areas are provided with both fire barriers and sprinkler systems
  - General Storage
  - Boiler Rooms
  - Furnace Rooms
  - Storage Rooms
  - Maintenance Shops
  - Paint Shops
  - Laundries (over 100 square feet)

## Alcohol Based Hand Rub

- 2000 EXISTING and New
- The corridor is at least 6 feet wide
- The maximum individual fluid dispenser capacity shall be 1.2 liters (2 liters in suites of rooms)
- The dispensers shall have a minimum spacing of 4 ft from each other
- Not more than 10 gallons are used in a single smoke compartment outside a storage cabinet.
- Dispensers are not installed over or adjacent to an ignition source.
- If the floor is carpeted, the building is fully sprinklered.
- 2012 Code - Permit 1-inch clearance to electrical receptacle or switch.



## Medical Gases and Anesthetizing Areas

- Medical gas storage and administration areas shall be protected in accordance with NFPA 99, Standards for Health Care Facilities, and NFPA 101.
  - (a) Oxygen storage locations of greater than 3,000 cu. ft. are enclosed by a one hour separation.
  - (b) Locations for supply systems of greater than 3,000 cu. ft. are vented to the outside.
- Piped in medical gas systems comply with NFPA 99.

## Anesthetizing locations

- Shall be protected in accordance with NFPA 99 and 101
- Shutoff valves are located outside each anesthetizing location and arranged so that shutting off one room or location will not affect others.
- Relative humidity is maintained equal to or greater than 35%.
- Master alarm panels are in two separate locations and have audible and visible signals.



## Transferring of oxygen

- Shall be separated from any portion of a facility wherein patients are housed, examined, or treated by:
  - a separation of a fire barrier of one hour fire-resistive construction; and
  - the area that is mechanically ventilated, sprinklered,
  - and has ceramic or concrete flooring; and
  - in an area that is posted with signs indicating that transferring is occurring,
  - and that smoking in the immediate area is not permitted.

## Electrical

- The ASC with life support equipment has a Type I Essential Electrical System powered by a generator with a transfer switch and separate power supply.
- Required emergency shall be tested and maintained in accordance with NFPA 110 Standard for Emergency and Standby Power Supplies.
- Generators are inspected weekly and exercised under load for 30 minutes per month.

## Electrical

- The Type I EES is divided into the critical branch, life safety branch and the emergency system
- The ASC with no life support equipment shall have an alternate source of power separate and independent from the normal source that will be effective for minimum of 1 1/2 hour after loss of normal source
- Electrical wiring and equipment shall be in accordance with NFPA 70, National Electrical Code

## Fire Alarm System

- A manual fire alarm system, not a pre-signal type, is provided to automatically warn the building occupants.
- Fire alarm system has initiation notification and control function.
- The fire alarm system is arranged to automatically transmit an alarm to summon the fire department

## Corridor Separation

- Corridors used as access to exit are separated from use areas by partitions with a fire resistance rating of at least one hour.
- Fire resistance rating not required if building fully sprinklered.
- Doors have at least one 20 minute fire protection rating and are equipped with a positive latch and closing device.
- Vision panels, if provided, in partitions or doors therein are not to exceed 20 inches and install at or below half distance from floor to room ceiling.

## 2012 Corridors

- Wheeled equipment permitted in the corridor if:
  - Equipment does not reduce the clear width to less than **5 feet**
  - Staff are trained to move the wheeled equipment during an emergency
  - Equipment is limited to carts “in use” (no time limit), emergency equipment and patient lifts and transport equipment
- Fixed furniture permitted in the corridor if:
  - The clear corridor width is no less than **6 feet**
  - Furniture is securely attached to the floor or wall and on one side only
  - Smoke detection is installed and the smoke compartment is fully sprinkled

## Occupancy Separation

- Ambulatory health care occupancies are separated from other tenants and occupancies by fire barriers with at least a 1 hour fire resistance rating.
- Doors in such barriers are solid bonded core wood of 1 3/4 inches or equivalent and are equipped with a positive latch and closing device.
- Vision panels, if provided in fire barriers or doors shall be of fixed fire window assemblies

## 2012 Subdivision of Building Space

- Revised language for a multiple tenant or mixed-occupancy building where there are uses present other than an ambulatory care facility
- Fire partition will be required between the care facility and those nonrelated spaces where the ambulatory care facility is intended to have four or more patients incapable of self preservation at any one time.



## **2012 Non-Patient Care Suite Definition & Suite Arrangements**

- A suite within a healthcare or ambulatory healthcare occupancy that is not intended for sleeping or treating patients.
- Travel distance within non-sleeping suites will be 100 ft. (NO reduction for multiple rooms or intervening rooms.)

## Smoke Barriers

- Ambulatory health care facilities are divided into at least two smoke compartments with smoke barriers having at least 1 hour fire resistance rating.
- Doors in smoke barriers are equipped with positive latcher.
- Doors shall be constructed of not less than 1 3/4 inch thick solid bonded core wood or equivalent.
- Vision panels are provided and are of fixed wire glass limited to 1,296 sq. inch per panel. (N/A for facilities of less than 5,000 sq. ft. with an approved smoke detection system, and less than 10,000 sq. ft. with an approved supervised sprinkler system.)

## Fire Extinguishers

- Portable fire extinguishers are provided
- Buildings over 75 ft. in height housing ambulatory health care facilities are provided with a complete approved automatic sprinkler system.

## Building Services

- Utilities shall comply with section 9.1 Electrical Wiring and Equipment and shall be in accordance with NFPA 70 National Electrical Code.
- Heating, ventilating, and air-conditioning shall comply with the manufacturer's specifications
- Portable space heating devices are prohibited except portable space heating devices shall be permitted to be used in non-sleeping staff and employee areas where the heating elements of such devices do not exceed 212°F (100°C).
- Elevators, dumbwaiters, and vertical conveyors shall comply
- Rubbish chutes, incinerators, and laundry chutes shall comply

## Emergency Plan and Fire Drills

- There is a written plan for the protection of all patients and for their evacuation in the event of an emergency.
- Fire drills are held at unexpected times under varying conditions, at least quarterly on each shift.
- The staff is familiar with procedures and is aware that drills are part of established routine.

## Smoking Regulations

- Smoking regulations are adopted.
- Post “NO SMOKING” signs or signs with the international symbol for no smoking where flammable liquids, combustible gases or oxygen are used or stored, and in any other hazardous location.

## Furnishings and Decorations

- Draperies, curtains and other loosely hanging fabrics and films serving as furnishings, except curtains at shower, shall be in accordance with NFPA 701.
- Newly introduced upholstered furniture shall be in accordance with NFPA 260, 261 unless building is fully sprinklered. Newly introduced mattresses shall meet NFPA 267.
- Combustible decorations shall be flame retardant.
- Solid linen or trash collection receptacles shall not exceed 32 gallons (121L) in capacity. The average density of container capacity in a room or space shall not exceed 0.5 gal/ft<sup>2</sup> (20.4L/m<sup>2</sup>). A capacity of 32 gal (121L) shall not be exceeded with any 64 ft<sup>2</sup> (5.9m<sup>2</sup>) area.
- Mobile soiled linen or trash collection receptacles with capacity greater than 32 gallons (121L) shall be located in a room protected as a hazardous area when not attended.

## CMS Consideration of Waiver

- CMS requires compliance with the LSC 2000
- If an organization cannot comply with a certain 101 requirement, and the resolution of that deficiency would be considered a significant hardship to do so, the organization is allowed to submit a request to CMS to waive that portion of 101.
- CMS Survey & Certification Letter, March, 2012
  - Recognition of a more residential approach to healthcare (S&CL specifically references nursing homes)
  - Intended to apply to all applicable healthcare entities required by CMS to adhere to NFPA 101
  - Unreasonable hardship to comply NOT required for the four listed provisions through a waiver request.

[https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/SCLetter12\\_21-.pdf](https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/SCLetter12_21-.pdf)



## CMS March 2012 S&CL

- 2012 edition allow:
  - Previously restricted items to be placed in exit corridors;
  - The recognition that a kitchen is not a hazardous area and can be open to an exit corridor under certain circumstances;
  - Changes allowing the installation of direct-vent gas fireplaces and solid fuel burning fireplaces; and
  - Changes to the requirements allowing the installation of combustible decorations.

# CMS Survey and Certification Letter S&CL

“Due to the complex nature of some of the requirements, each waiver request **will have to be evaluated separately** in the interest of fire safety and to ensure that the facility has followed all LSC requirements and the equipment has been installed properly by the facility. All waiver requests will be processed in the regular fashion with input from the State Survey Agency and final approval by the CMS Regional Office.”

[https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/SCLetter12\\_21-.pdf](https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/SCLetter12_21-.pdf)

# 2015 Ambulatory Healthcare Occupancies

## Focus

### Continued discussion

- Lighting and contrast
- Noise issues related to alarms
- Robotics, charging, storage, auto shutdown
- Non-fire emergency hardening (e.g. Joplin tornado)
- Travel distance to exits
- Corridor definitions
- Decorations not attached to wall
- Surgical Fires

### No Action at present

- Three or less patients
- Temporary structures
- Evacuation of bariatric patient
- Ambulatory HC chapters



# Preventing Surgical Fires

**Celebrated ONE YEAR ANNIVERSARY**  
National Fire Prevention Week, October 7-13, 2012

- [Preventing Surgical Fires](#)
- [How Surgical Fires Start](#)
- [About the Preventing Surgical Fires Initiative](#)
- [Recommendations for Healthcare Professionals on Preventing Surgical Fires](#)
- [Information for Patients on Surgical Fires](#)
- [Initiative Partners](#)
- [Resources and Tools for Preventing Surgical Fires](#)

<http://www.fda.gov/Drugs/DrugSafety/SafeUseInitiative/PreventingSurgicalFires/default.htm>