



THE WAIT IS OVER...HERE COMES THE 2012 LIFE SAFETY CODE®

After years in the making, the Department of Health & Human Services made it official...CMS will be adopting the 2012 edition of the Life Safety Code® (NFPA 101), thus replacing the existing reference to the 2000 edition.

The Final Rule constitutes 133 pages in the Federal Register, so we thought it would be helpful to highlight key changes you should be aware of, along with the support services we provide to enhance compliance:

- The regulation becomes effective on July 5, 2016. This is a very brief 60 days from the time the regulation was published.
- All high-rise healthcare occupancies (taller than 75 feet) will require complete sprinkler protection 12 years from the time of Code adoption (by July 2028).
- The 2012 edition of NFPA 99 (Health Care Facilities Code) has also been adopted. However, Chapters 7, 8 and 13 do not apply. Chapter 12, Emergency Management, has also been exempted as CMS plans on issuing its own emergency management regulations.
- CMS will follow the Life Safety Code® language requiring a fire watch or building evacuation if the sprinkler system is out of service for 10 or more hours in a 24 hour period. Previously, an outage of four (4) or more hours kicked in the fire watch requirements.
- The cultural change components of the 2012 Life Safety Code® will be permitted and no longer require a categorical waiver. Healthcare facilities will have more flexibility to provide seating in corridors, design open cooking arrangements and even install certain types of fireplaces.
- CMS did not include a proposal that would require the installation of smoke exhaust systems in windowless anesthetizing locations.
- Although the 2012 Life Safety Code® does not require windows in patient sleeping rooms, CMS will require windows in all patient sleeping rooms. Sill heights in new construction must not be higher than 36 inches above the floor.
- Inspection and maintenance of fire and smoke door assemblies will be required annually.

As we have been providing Code assessment and compliance support to our clients over the last few years, we have proactively incorporated the ramifications of the 2012 edition. In many cases, we accomplished this through the application of Categorical Waivers. With the Final Rule in place, we can now address all the nuances and specific CMS amendments.

RPA continues to offer the following Code compliance support services:

- 1) NFPA 101 (2012 edition) education programs for state associations, regional associations, health systems and other corporate clients – Webinars, .5 day education programs, 1 day or 1.5 day education programs.
 - a. Since 2013, RPA has been providing education on the 2012 edition for clients and corporate groups that wanted to be ahead of the curve.
- 2) Wall-to-wall Statement of Conditions (SOC™) and life safety compliance surveys for healthcare facilities. We currently complete life safety compliance surveys for more than 500 hospital, nursing home and ambulatory health care facilities throughout the nation to support our clients.
- 3) Smoke and fire door assembly inspection services. RPA will inspect and inventory fire rated door assemblies (including linen chute and trash chute doors) and smoke barrier door assemblies as required by the 2012 edition (Section 7.2.1.15.2). Doors enclosing hazardous areas will also be inspected and inventoried regardless of their rating.

There is certainly more to come as the Final Rule is dissected and analyzed. RPA will keep you posted on the details and interpretations as they are vetted out. As always, don't hesitate to contact us with any questions you may have.

If you do have a specific service need for SOC™/Life Safety survey support at this time, you can reach out to Caitlin Casey at 860-793-8600 or ccasey@phillipsllc.com.

Best regards,

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