



POWER STRIPS – MAKING SENSE OF IT ALL

October 16, 2014

UNDERSTANDING THE CMS CATEGORICAL WAIVER PROVISION

The Centers for Medicare & Medicaid Services (CMS) much anticipated release of a Survey & Certification Memorandum addressing power strips provides some important clarification to the ongoing confusion and misinterpretation regarding the permitted use of power strips in healthcare settings. However, the CMS information also raises some new questions and leaves some definitions open for interpretation. It appears that CMS will be providing some additional clarification in the future. In the meantime, here are some clarifying points regarding power strip use and the intent of the S&C Memorandum.

There are essentially three (3) specific components to the S&C Memorandum:

- 1. Utilizing Power Strips for Medical Equipment:** CMS is permitting a categorical waiver that will permit healthcare facilities to apply the 2012 edition of NFPA 99 (The Health Care Facilities Code) relative to power strips.
- 2. Long-term Care Exemption:** Under certain circumstances, CMS is exempting long-term care facilities from the prescriptive and restrictive requirements relative to power strips that are outlined in the 2012 edition of NFPA 99 (The Health Care Facilities Code).
- 3. Utilizing a Categorical Waiver:** CMS has outlined a specific process for utilizing this categorical waiver to take advantage of the power strip provisions.

This information will likely be applicable to other authorities having jurisdiction with CMS deemed status.

APPLYING THE 2012 EDITION OF NFPA 99 (THE HEALTH CARE FACILITIES CODE)

Historically, NFPA 99 has only included provisions for the use of power strips in anesthetizing locations. However, the 2012 edition of NFPA 99 includes provisions for using power strips to power rack, table, pedestal, or cart mounted equipment. Section 10.2.3.6 outlines a number of conditions including the necessity for the power strip to be permanently attached to the equipment assembly. When meeting all the prescribed conditions, this will permit what is already the common practice of utilizing power strips to power various medical equipment assemblies.

NFPA defines the "patient care vicinity" as a location intended for the examination and treatment of patients expanding six (6) feet beyond the device supporting the patient (i.e. bed, table, or chair) and 7.5 feet above the floor. Power strips are not permitted in the "patient care vicinity" for non-patient care equipment including patient personal electronic devices (i.e. phones, tablets, or other portable devices). Such items must be plugged directly into a normal receptacle. Power strips may be used to power electronic devices outside of the "patient care vicinity".

All power strips should have a UL listing. Power strips serving medical equipment should be listed as UL 1363A or UL 60601-1. Power strips serving other items such as personal electronics should be listed as UL 1363.

LONG-TERM CARE EXEMPTION

CMS is providing long-term care facilities relief from the strict prescriptive power strip requirements in certain situations. Facilities that “do not use line-operated electrical appliances for diagnostic, therapeutic, or monitoring purposes” are exempt from the requirements outlined in the 2012 edition of NFPA 99. Ultimately, the power strip requirements will apply if electronic medical equipment is plugged in and connected to a resident. This is intended to address higher acuity situations where residents may be connected to monitors or similar electrical treatment or diagnostic equipment. This is not intended to encompass common equipment such as electric beds and oxygen concentrators. In these arrangements, there is not a direct electrical connection between the equipment and a resident.

For long-term care facilities that meet the exception, power strips can be utilized for items such as cell phones, tablets and other personal electronics. However, the following requirements and best practices have not changed:

1. Do not use multiple plug adaptors or power strips to compensate for an inadequate number of permanent electrical outlets. If permanent electrical devices in a room exceed the number of wall electrical outlets, consider having additional electrical outlets installed by a licensed electrician.
2. Power strips can be considered for items such as computers, tablets, clocks, audio devices, and temporary electrical items used by a resident or patient that are powered or charged in a sleeping room.
3. Do not use receptacle “splitters” and do not “daisy chain” (connect multiple) power strips together.

As always, your state and/or local Authority Having Jurisdiction ultimately has the final say in what they will or will not accept.

CATEGORICAL WAIVER

To take advantage of the categorical waiver option, the healthcare facility is not required to formally apply or communicate with CMS. Rather, it must document its decision to utilize the power strip categorical waiver provision. Additionally, the organization must make the survey team aware of its application of the categorical waiver at the survey opening meeting / conference for any life safety compliance related survey.

LEARN MORE

Although CMS has provided some clarifying information, the requirements pertaining to the use of power strips in healthcare facilities is far from simple. The following information should be reviewed and applied in conjunction with this informational brief:

- Access the September 26, 2014 [CMS Survey & Certification Memorandum](#) addressing power strips.
- View NFPA's free access to the [2012 Edition of NFPA 99](#) (The Health Care Facilities Code).
- Download a [Categorical Waiver Declaration Form \(template\)](#) that addresses all CMS categorical waiver options including the power strip provision.

Please contact Russell Phillips & Associates at info@phillipsllc.com or 585-223-1130 for any questions on power strips or any Life Safety/Code Consulting questions. On-site consulting support and staff education is available as well.

Visit our website www.phillipsllc.com for more information.