

Frequently Asked Questions (FAQs)

Nursing Home/Facilities

Life Safety Code 2000 Edition

(Revised 3/30/07)

1. What decorations are allowable in a facility for the facility to comply with the life safety code requirements regarding decorative materials?

Chapter 19.7.5.4 of the *Life Safety Code 2000 Edition* states that combustible decorations shall be prohibited in any health care occupancy unless they are flame-retardant. Exception: combustible decorations, such as photographs and paintings, in such limited quantities that a hazard of fire development or spread is not present. Chapter 10.3.5 states that furnishings or decorations of an explosive or highly flammable character shall not be used. Examples of explosive or highly flammable decorations: Christmas trees; not effectively flame-retardant treated crepe paper decorations; finely divided tinsel-like material; pyrozylin plastic decorations; and real pine trees or branches.

Attaching decorations to doors in the means of egress is viewed in the context of a fire compromising the fire rating of the door. While a small amount of decoration on a door may be acceptable, such as names of the residents in a room or schedules; total coverage is not. Decorations may not be hung from sprinkler heads and decorations cannot be hung in such a manner that exit signs or exit doors are blocked from view.

Items such as ordinary photographs, paintings, greeting cards, posters and pictures colored by grandchildren are not considered or classified as hazardous. Decorations cannot exceed 10 percent of the total wall covering. Centers for Medicare and Medicaid Services (CMS) relies on the surveyor to exercise good judgment in determining what is acceptable or what is excessive.

Use of bales of hay or cornstalks as decorations outside the facility may present a hazard as these areas are frequently unattended and ignition from a careless cigarette can easily occur.

The use of cut or dead Christmas trees in healthcare facilities is prohibited because of their highly flammable nature when dry. Even those trees kept in water or treated with fire-retardant material tend to dry out over a period of time, making them flammable. Live potted plants or trees are acceptable as long as proper care of the plant is taken to prevent the plant from drying out.

2. What are the ventilation requirements for oxygen storage?

When the total volume of the oxygen cylinders is less than 3000, cubic feet there are no ventilation requirements.

When the total volume is greater than 3000, cubic feet, the area must be mechanically ventilated per *NFPA 99, 1999 Edition*, Chapter 4-3.1.1.2(b)4. Locations for supply systems of more than 3000, cubic feet total capacity

(connected and in storage) shall be vented to the outside by a dedicated mechanical ventilation system or by natural venting. If natural venting is used, the vent opening or openings shall be a minimum of 72 square inches in total free area.

3. What is required for separation of oxygen from combustibles or incompatible materials?

NFPA 99, 1999 Edition Chapter 8-3.1.11.2 (c) 2 requires a minimum distance of five feet if the entire storage location is protected by an automatic sprinkler system designed in accordance with *NFPA 13, Standard for the Installation of Sprinkler Systems, 1999 Edition*; or

Chapter 8-3.1.11.2 (c) 3 requires an enclosed cabinet of noncombustible construction having a minimum fire protection rating of one-half hour for cylinder storage. Also an approved flammable liquid storage cabinet shall be permitted to be used for cylinder storage.

4. What are the requirements for transferring of liquid oxygen?

NFPA 99, 1999 edition, Chapter 8-6.2.5.2 sets forth the requirements for transferring liquid oxygen.

The transferring of liquid oxygen from one container to another shall be accomplished at a location specifically designated for the transferring that is as follows:

- (a) 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

[Note: Doors must be equipped with self-closing device, positive latching hardware, and must have at least a ¾ hour fire rating to establish the required separation. (Explanation added)]

- (b) The area is mechanically ventilated, is sprinklered and has ceramic or concrete flooring; and
- (c) The area is posted with signs indicating that transferring is occurring and that smoking in the immediate area is not permitted.

Transferring shall be accomplished utilizing equipment designed to comply with the performance requirements and producers of CGA (Compressed Gas Association) Pamphlet P-2.6, *Transfilling of Low-Pressure Liquid Oxygen to be Used for Respiration*, and adhering to those procedures. The use and operation of small portable liquid oxygen systems shall comply with the requirements of CGA Pamphlet P-2.7, *Guide for the Safe Storage, Handling and Use of Portable Liquid Oxygen Systems in Health Care Facilities*. CGA pamphlets may be purchased at <http://www.cganet.com>.

5. Is the transferring of liquid oxygen allowed in resident/patient sleeping rooms?

No, the transferring of liquid oxygen in resident sleeping rooms is strictly prohibited according to *NFPA 99, 1999 Edition*. Refer to question 4 above for acceptable locations for the transferring of oxygen.

6. What are the oxygen cylinder sizes as in cubic feet?

To determine what the total cubic feet of oxygen storage follow the listed size chart:

D cylinders - 15 cubic feet
E cylinders - 24 cubic feet
M cylinders - 122 cubic feet
G cylinders - 244 cubic feet
H or K cylinders - 250 cubic feet

7. Are no smoking signs required to be posted on the outside of resident sleeping rooms that use oxygen?

Yes, Ohio Administrative Code rule 3701-17-20 requires that "No Smoking" signs be posted in areas and on doors of rooms where oxygen is stored or in use. Therefore, the posting of no smoking signs is required in **all** facilities including designated non-smoking facilities.

8. Is it permitted to store a limited number of oxygen cylinders in an area that does not meet the code requirements pertaining to the storage of oxygen?

Yes, one or two cylinders may be stored at a nurse's station or on a crash cart when they are going to be used for emergency purposes only. They must be secured in an upright position with a regulator attached to the cylinder.

9. Can a "Rubbermaid" shed be used for outside storage of oxygen cylinders?

NFPA 99, 1999 Edition, Chapter 8-3.1.11.2 (a) provides that storage locations shall be outdoors in an enclosure or within an enclosed interior space of noncombustible or limited-combustible construction, with doors that can be secured against unauthorized entry. Therefore, a "Rubbermaid" shed may be used if it is of noncombustible or limited-combustible construction with doors that are secured against unauthorized entry.

10. Can alcohol based hand cleaner dispensers be placed or mounted in the corridors?

Yes, under the following conditions prescribed by the Centers for Medicare and Medicaid Services:

- Only alcohol based hand rub (ABHR) solutions from single use bags that are compressed to dispense are acceptable (non-aerosol).
- The corridor must be at least six feet wide.
- Maximum individual dispenser fluid capacity is:
 - 1) 0.3 gallons (1.2 liters) for dispensers in rooms, corridors and areas open to corridors
 - 2) 0.5 gallons (2.0 liters) for dispensers in suites of rooms.
- Dispensers shall have a minimum horizontal spacing of four feet from each other.
- Not more than an aggregate 10 gallons (37.8 liters) of ABHR solution in use in a single compartment outside of a storage cabinet.
- f. Storage of quantities greater than 5 gallons (37.8 Liters) in a single smoke compartment shall meet the requirements of NFPA 30, *Flammable and Combustible Liquids Code*.
- The dispensers shall not be installed over or directly adjacent to an ignition source such as an electrical outlet or switch.
- In locations with carpeted floor coverings, dispensers installed directly over carpeted surfaces are permitted only in sprinklered smoke compartments.
- No conflict with local codes.
- Installation minimizes spills and leaks.
- Dispensers are installed in a manner that adequately protects against inappropriate access (e.g. dementia units).
- Dispensers must be adequately maintained.

11. Is upholstered furniture that is located in business offices or similar areas required to be rated?

Life Safety Code 2000 Edition, Chapter 19.7.5.2 provides that any newly introduced upholstered furniture within health care occupancies shall meet the criteria specified when tested in accordance with the methods cited in 10.3.2 (2) and 10.3.3. Existing upholstered furniture shall be permitted.

12. Does upholstered furniture owned by residents need to be fire rated?

No, patient owned upholstered furniture does not need to be fire rated, if the facility is completely sprinklered. (*Life Safety Code 2000 Edition*, Chapter 19.7.5.2 exception #1.)

13. Are surge protectors (multi-plug strips) permitted?

Power strips with surge protection may not be used in resident rooms in the "patient vicinity." This means the area around the patient bed. Power strips may be used in non-wet, non direct patient areas.

- No medical equipment, including the resident bed or any high current draw devices can be plugged into a power strip. No hair dryers or refrigerators may be plugged into power strips.
- Equipment such as televisions, DVD players, and clocks, may be plugged into a power strip.
- Power strips are not allowed to be plugged into another power strip and extension cords can not be plugged into them. Where additional outlets are needed in the patient vicinity they must be installed in accordance with *NFPA 70 – 1999 edition, The National Electrical Code*
- Power strips can not be covered with rugs or other material.

14. What is defined as a hazardous storage area?

Any area that poses a degree of hazard greater than that normal to the general occupancy of the building or structure, such as areas used for the storage or use of combustibles or flammables; toxic, noxious, or corrosive materials; or heat producing appliances. *Life Safety Code 2000 Edition*, Chapter 19.3.2.1 (7) includes rooms or spaces larger than 50 square feet, including repair shops, used for storage of combustible supplies and equipment in quantities deemed hazardous by the authority having jurisdiction (AHJ). In this case the AHJ would be the Life Safety Code Surveyor conducting the survey.

15. Do laundry / linen chutes between floors need to be locked?

Laundry/linen chute doors must have positive latching hardware. Locking of these doors is not a Life Safety Code requirement. However, to comply with state and federal requirements related to resident safety, laundry/linen chutes must be protected from unauthorized entry. For example, the laundry/linen chute could be locked or could be located in a secure location inaccessible to residents

16. If a facility is currently being surveyed under the Fire Safety Evaluation Survey, or FSES, and the facility is now in compliance because of changes in the life safety code requirements, does the facility still have to be surveyed under the FSES?

No, the FSES is a measuring system which is an alternative approach for compliance with the Life Safety Code. It compares the level of safety provided by an arrangement of safeguards that differ from those specified in *NFPA 101, Life Safety Code* to the level of safety provided in a building that conforms exactly to the details of the code. It is the responsibility of the facility to request an FSES.

17. Does the Life Safety Code prohibit window stops to prevent a window from opening more than six inches?

No, *Life Safety Code 2000 Edition*, Chapter 19.3.8 states that each patient sleeping room shall have an outside window or outside door, it does not require the window to be operable. Additionally, there is no requirement in the *Ohio Building Code 2002 edition* for windows to be operable in a nursing home.

18. What are the requirements for trash cans in resident rooms?

Life Safety Code 2000 Edition, Chapter 19.7.5.5 provides that soiled linen or trash collection receptacles in resident rooms shall not exceed 32 gallons in capacity. Although these trash containers are not required to be fire rated, under the Life Safety Code requirements, the nursing home licensing rules establish requirements for ash trays and waste baskets as discussed below.

Under the *Life Safety Code 2000 Edition*, large mobile soiled linen or trash receptacles with capacities greater than 32 gallons can be moved along the corridor as collections occur but must be fire rated and attended by staff. If staff must leave the area, then the container must be stored in a room designed and maintained as a hazardous area in accordance with Chapter 19.3.2.1.

Ohio Administrative Code rule 3701-17-20 pertaining to nursing home licensure, states that ash trays, waste baskets or containers where burnable materials may be placed shall not be made of materials which are flammable, combustible or capable of generating quantities of smoke or toxic gases. Ash trays and waste baskets and containers where burnable materials may be placed shall be noncombustible or carry a fire resistant "UL" or "FM" rating.

19. Who do I contact to report an incident of fire?

Send reports of incidents of fire to the Division of Quality Assurance, Bureau of Regulatory Compliance to the attention of the Safety and Health Consultant and to the State Fire Marshal. The form is available on the Ohio Department of Commerce's Website at <http://www.com.state.oh.us/sfm/fireform.htm#code>.

20. Who do I contact to report that the fire alarm or sprinkler system will be down for more than four hours and the initiation of a fire watch?

To comply with the *Life Safety Code 2000 Edition* requirements for Medicare/Medicaid certification notify the appropriate Bureau of Long Term Care District Office. We also recommend that you also contact your local fire department.

21. Is it permissible to conduct a silent fire drill on third shift and still be in compliance with federal and state requirements?

Yes, the *Life Safety Code 2000 Edition* Chapter 19.7.1.2 and Ohio Administrative Code rule 3701-17-25 state that drills conducted between 9 p.m. and 6 a.m. may use a coded announcement instead of an audible alarm.

22. A three bin soiled utility/ trash container has a combined capacity of over 32 gallons. Each individual container has a separate lid and a capacity of less than 32 gallons. Is this considered a container over 32 gallons?

Yes, the container is considered to be over 32 gallons and would, therefore, have to be located in a room protected as a hazardous area. (*Life Safety Code 2000 Edition*, Chapter 18.7.5.5 and Chapter 19.7.5.5)

For additional information contact:

**Safety & Health Consultant
Bureau of Regulatory Compliance
614-644-6220**

Note: Responses to questions are intended to assist providers in their efforts to comply with the Life Safety Code in a general manner. Terms that are used may not be well understood by readers who are unfamiliar with building and fire safety codes. Consultation with qualified fire safety engineers or other qualified professionals is advisable. *Compliance with Life Safety Code requirements is determined at the time of a survey.*