Compliance in the Physical Environment

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The Joint Commission

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Topics / Learning Objectives

- Joint Commission Survey Prep | Key documents
- Be In The Know
- Top Observations | Safer Matrix Placement
- Compliance Questions

TJC Survey Process /Updates

Survey Agenda

- Arrival 07:45 (NO 7:30 notice)
- **Facility Orientation**
  8:00-9:00
- Opening Conf 9:00
  LSCS exit after intros
- Document Review
  paper or electronic
  use checklist!
- Critical Pressure checks (ORs)
- Lunch
- Continue building tour – start at the top
- “Hard Stop” (debrief) at end of each day

TJC Resources (handout)

Three Questions?

Survey Prep

- Organizations must have all required documentation
  - Document review checklist is included in Survey Activity Guide

- Required documents called out in elements of performance (EP)

- These EPs have the “D” icon

Document Review Checklist

STANDARD - EPs	See Legend C	NC	NA	IOU	Document / Requirement	Frequency	Q1 Semi	Q2	Q3 Semi	Q4 Annual
EC.02.03.05					Fire Protection and Suppression Testing and Inspection					
EP 1					Testing for pressure supervisory indicating devices (including both high- and low-air pressure switches), water level supervisory indicating devices, water temperature supervisory indicating devices, room temperature supervisory indicating devices, and other suppression system supervisory initiating devices NFPA 72-2010: Table 14.4.5	Quarterly				
					Testing for valve supervisory switches NFPA 72-2010: Table 14.4.5	Semiannual				
					Testing for other supervisory initiating devices NFPA 72-2010: Table 14.4.5	Annually				
EP 2					Water flow devices NFPA 72-2010: Table 14.4.5 NFPA 25-2011: Table 5.1.1.2	Semiannual				
					Tamper switches NFPA 72-2010: Table 14.4.5	Semiannual				
EP 3					Duct, heat, smoke detectors, and manual fire alarm boxes NFPA 72-2010: Table 14.4.5; 17.14	Annually				
EP 4					Notification devices (audible & visual), and door-releasing devices NFPA 72-2010: Table 14.4.5	Annually				
EP 5					Emergency services notification transmission equipment NFPA 72-2010: Table 14.4.5	Annually				
EP 6					Electric motor-driven fire pumps tested under no-flow conditions NFPA 25-2011: 8.3.1; 8.3.2	Monthly				
					Diesel-engine-driven fire pumps tested under no-flow conditions NFPA 25-2011: 8.3.1; 8.3.2	Weekly				
EP 9					Sprinkler systems main drain tests on all risers NFPA 25-2011: 13.2.5; 13.3.3.4; Table 13.1.1.2; Table 13.8.1	Annually				

Survey Prep / Document Review

- Accurate Statement of Conditions (SOC)
- Management Plans / Annual Plan Review
- Accurate Life Safety Drawings

Inpatient Hospice – Deemed

- Beginning March 2025 Life Safety Code Surveyors will survey deemed inpatient hospice
- Evaluated under Chapter 18/19 Life Safety Code
- All other survey / post survey processes remain the same

Updates for LSCSs

- Providing Resources to Accredited Organizations
  - New survey tools
    - Document submittal
    - Updated SAFER
- Inventory Management for EC/LS
- Scoring consistency/SAFER Placement
- Sustainable Healthcare Certification

Be In The Know

High Rise Sprinkler Requirement

NFPA 101-2012

19.4.2 High-Rise Buildings.

19.4.2.1 All high-rise buildings containing health care occupancies shall be protected throughout by an approved, supervised automatic sprinkler system installed in accordance with Section 9.7 within 12 years of the adoption of this Code, except as otherwise provided in 19.4.2.2.

July 5th, 2028

Plant Operations Staff Competency

- Evaluation of the manager/director incorporated in HR review

- Life Safety Code Surveyor will review staff/vendors competency in document review session

- Functional areas where staff competency is reviewed
  - Fire alarm | medical gas | fire doors | other based on municipality

Compliance Tips

- Accredited organizations can schedule a phone conference with the Standards Interpretation Group (SIG) outside a survey event

- Issue resolution calls can be scheduled during survey event

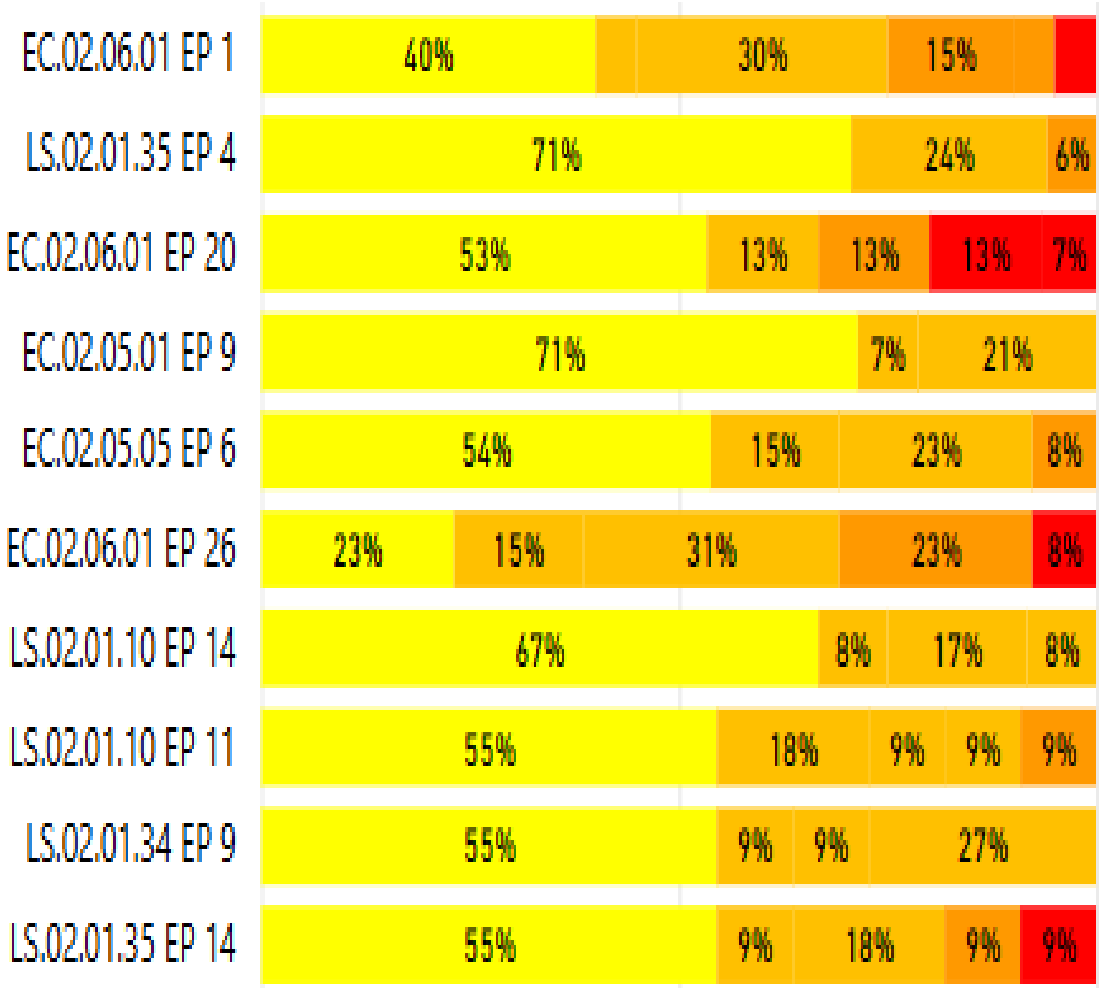
- Clarifications must be submitted within 10 days of receiving final survey report

CMS Validation

- Underway since October 2023 (CMS FY)
- Unannounced!
- 1:1 Observation for entire length of survey
- Independent CMS contractor / observer
- Observation Only!
- Hospital does not get report from Contractor

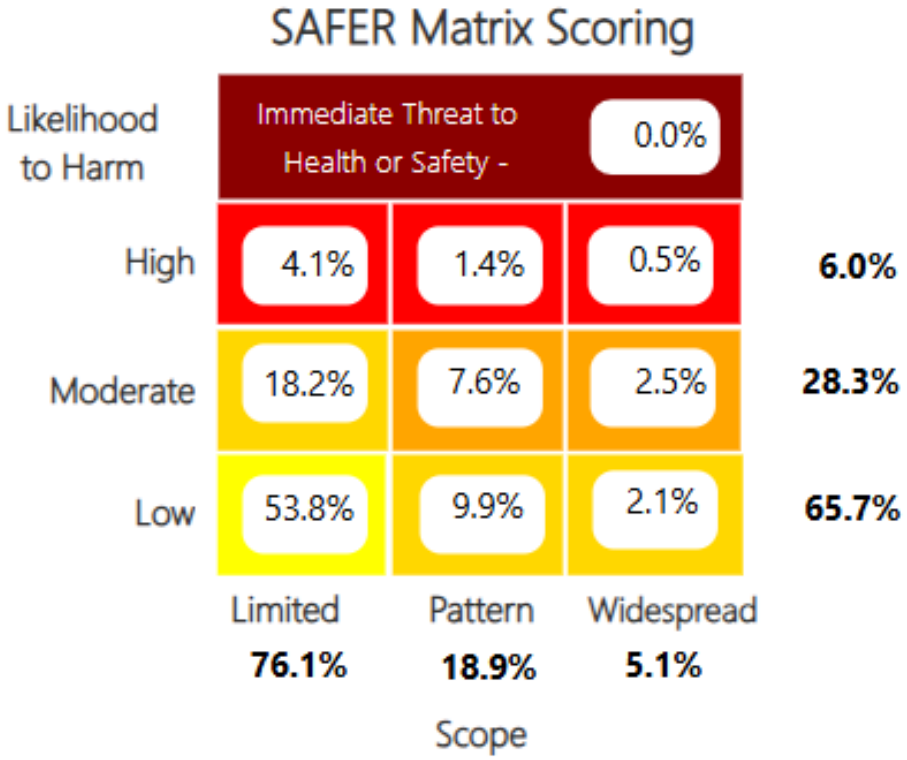
Safer Matrix / High Risk Deficiencies

Top Observations (Risk) Jan – Dec 2024

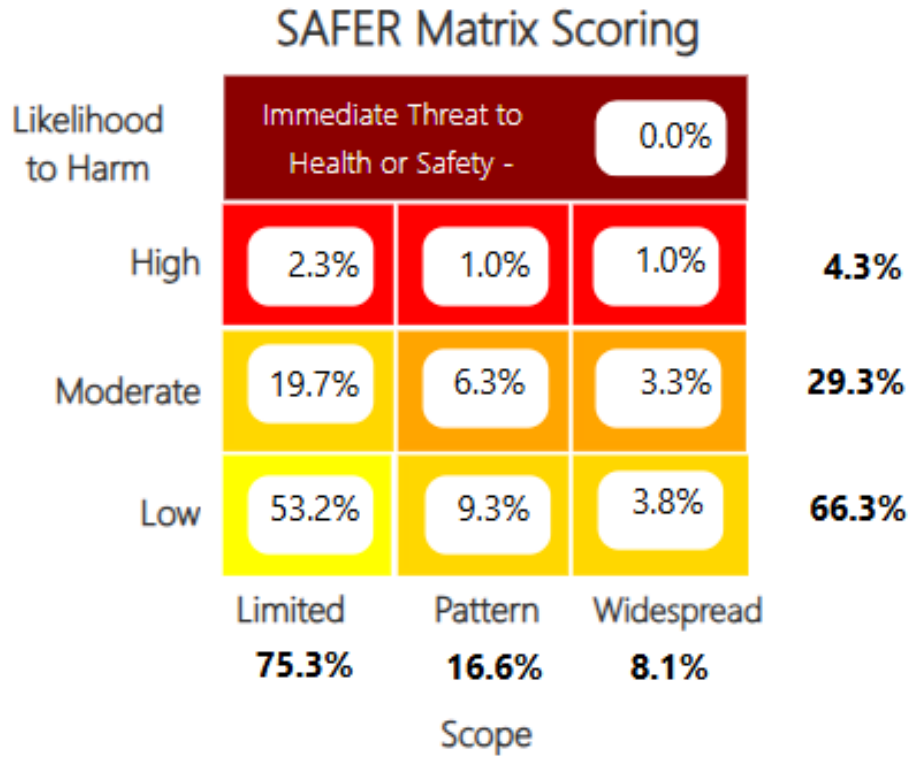


1. Maintaining environment – non code
2. Items supported by sprinkler pipe
3. Maintaining environment – dusty equip
4. Utility controls not labeled
5. Inspection, testing, maint. (ITM) low risk
6. Maintaining environment – appliances
7. Barrier penetrations
8. Fire doors not latching
9. Ceiling penetrations w/smoke detection
10. Blocked extinguishment

Safer Matrix – Alabama to All States



Alabama



Nationwide

EC 02.06.01 EP 26

The hospital keeps furnishings and equipment safe and in good repair.

Observation: Observed in Tracer Activities. During a tracer in the Wound Care Clinic in the examination room it was noted that a Reclining Examination Chair had a tear in the to the surface, which prevented proper cleaning and low-level disinfection between patient use. This is the only exam chair of the eight that were examined to have a tear or rip.

EC 02.06.01 EP 01

Interior spaces meet the needs of the patient population and are safe and suitable to the care, treatment, and services provided.

Observation: Observed in Building Tour. There were stained ceiling in multiple locations throughout the facility. Fire alarm panel room, pharmacy, and laboratory.

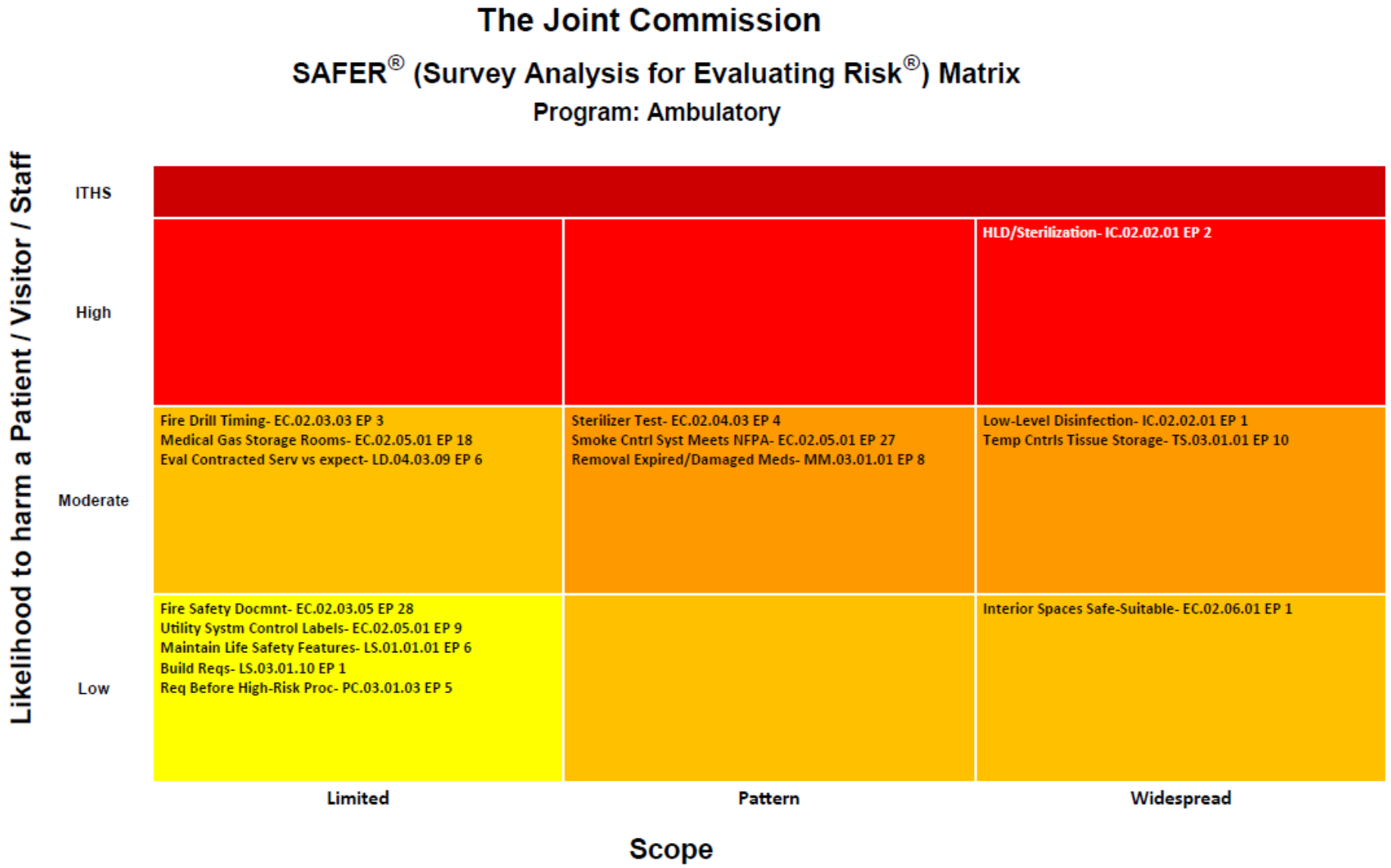
EC 02.05.01 EP 23

Power strips in a patient care vicinity are only used for components of movable electrical equipment assemblies used for patient care. These power strips meet UL 1363A or UL 60601-1. Power strips used outside of a patient care vicinity, but within the patient care room, meet UL 1363. In non–patient care rooms, power strips meet other UL standards. (For full text, refer to NFPA 99-2012: 10.2.3.6; 10.2.4; NFPA 70-2011: 400-8; 590.3(D); Tentative Interim Amendment [TIA] 12-5).

EC 02.05.01 EP 23, continued

Observation: Observed in Building Tour. In Or 12 there was a power strip mounted to a cart. A patient warmer adjacent to the cart was plugged in to the power strip. In C-Section Rooms 4, 5 and 6 there were power strips mounted to IV poles. Surgical tables, Patient warmers and other devices adjacent the IV poles to the were plugged into the power strips.

New Survey Report Format



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Compliance Questions

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Compliance Questions

- **Question** – What are preventive maintenance completion rates for the following categories of utility equipment: high risk, non-high risk, infection control?

- **Response** – The completion percentage requirement for these three categories of equipment is….

100%

Compliance Questions

- **Question** – Is this the same for medical equipment

- **Response** – **Yes!** All medical equipment whether high risk or non-high risk is to have a 100% preventive maintenance completion rate.

Compliance Questions

- **Question** – Ventilation requirements in ORs' and Sterile Storage areas.

- **Response** – ASHRAE 170-2008 table 7.1 does allow for temporary deviations for temperature. These are determined by procedure, physician and or patient requirement. This allowance cannot be used as a permanent or universal adjustment to the ventilation requirements.

Compliance Questions

- **Question** – Ventilation requirements in ORs' and Sterile Storage areas. Continued

- **Response** – Once the case(s) for which the allowance has been concluded the OR's must be returned to the proper operating parameters. This allowance does not provide a provision to deviate from the humidity nor the air pressure relationship requirements for either ORs' or Sterile Storage spaces.

Compliance Questions

- **Question** – What are the ventilation requirements for Endoscopy and Bronchoscopy areas?

- **Response** – Addendum “w” to the 2008 ventilation table changed the requirement from positive air pressure to no requirement. Bronchoscopy procedures are to be performed in a negatively air pressured space.

Compliance Questions

- **Question** – Energy management for ORs', how does this affect room pressures, temperature/humidity.

- **Response** – It is acceptable to lower temperatures and air exchanges per hour (ACH) rates in ORs' when they are off-line. Positive air pressure relationships and a compliant relative humidity range must be kept.

Compliance Questions

- **Question** – Relocatable power taps (RPTs) are often discussed and cited on survey. There is a need to know the guidelines around the code compliant use of these devices.

Power Strips EC 02.05.01 EP 23

NFPA 99-2012, 10.2.3.6 Multiple Outlet Connection. Two or more power receptacles supplied by a flexible cord shall be permitted to be used to supply power to plug-connected components of a **movable equipment assembly** that is rack-, table-, pedestal-, or cart mounted, provided that all of the following conditions are met:

(1)The receptacles are permanently attached to the equipment assembly.

(2) The sum of the ampacity of all appliances connected to the outlets does not exceed 75 percent of the ampacity of the flexible cord supplying the outlets.

(3) The ampacity of the flexible cord is in accordance with *NFPA 70*, *National Electrical Code*.

(4) The electrical and mechanical integrity of the assembly is regularly verified and documented.

NFPA 70-2011 - National Electrical Code

400.8 Use Not Permitted. Unless specifically permitted in 400.7, flexible cords and cables shall not be used for the following:

(1) As a substitute for the fixed wiring of a structure

(2) Where run through holes in walls, structural ceilings, suspended ceilings, dropped ceilings, or floors

(3) Where run through doorways, windows, or similar openings

(4) Where attached to building surfaces

NFPA 70-2011 - National Electrical Code

Exception to (4): Flexible cord and cable shall be permitted to be attached to building surfaces in accordance with the provisions of 368.56(B) This provision is for flexible cords and cables in a busway

(5) Where concealed by walls, floors, or ceilings or located above suspended or dropped ceilings

(6) Where installed in raceways, except as otherwise permitted in this *Code*

(7) Where subject to physical damage

Power Strips pole mounted

Does this picture depict a compliant configuration according to NFPA 99-2012, 10.2.3.6

1. Is it permanently attached to the equipment assembly?
2. Does the sum of the ampacity come below 75% of the power strip rating?
3. Is the ampacity of the flexible cord in accordance with NFPA 70?
4. Is the electrical and mechanical integrity verified and documented?

Power Strips pole mounted

NFPA 99-2012, 10.2.3.6 Multiple Outlet Connection. Two or more power receptacles supplied by a flexible cord shall be permitted to be used to supply power to plug-connected components of a **movable equipment assembly** that is rack-, table-, pedestal-, or cart mounted, provided that all of the following conditions are met:

Movable equipment assembly

Equipment assembly.

The intent of the code (NFPA 99-2012, 10.2.3.6) is that all items plugged into the power strip are meant to be used for a singular clinical application or function

Not an Equipment assembly.

In cases where the power strip is supplying power to discrete medical devices and an item were to be unplugged but not affect the clinical application or function of the remaining devices that are plugged in.

This is considered as a substitute for fixed wiring

Movable equipment assembly

This is an example of an equipment assembly. Assuming that it meets all the requirements of NFPA 99-2012,10.2.3.6 it would be compliant

Questions?