



**MOMENTUM**  
**2023 ANNUAL  
MEETING & EXPO**

Renaissance Schaumburg  
Convention Center - Schaumburg, IL

| Top IDHP Life Safety Code Findings for  
Senior and Assisted Living Facilities

# Top IDPH Life Safety Code Findings for Senior and Assisted Living Facilities

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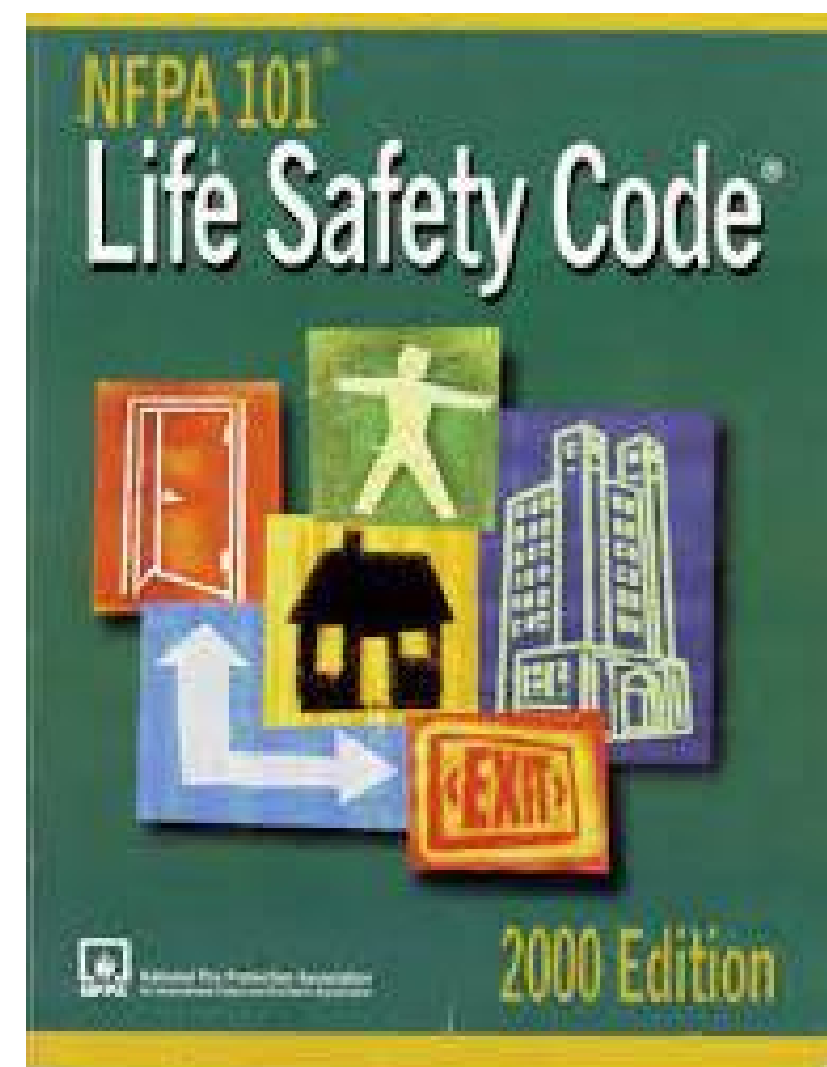


# Presenters

- Lamar Davis
- 25 Years Healthcare Facilities Experience – Director of Facilities & Engineering
- Life Safety Code Surveyor since 2013 for a National Accreditation Agency
- Surveyed over 400 various Healthcare Facilities
- Member of ASHE – American Society for Healthcare Engineering
- Anne Guglielmo
- 20 Years of Fire Protection, Life Safety, and Healthcare Experience
- Previously staff engineer for a National Accreditation Agency
- Surveyed hundreds of Healthcare Facilities across the Country
- Member of NFPA 101 Technical Committee (Ch 18/ 19/20/21/32/33)
- Member of ASHE – National Board

# Objectives

- Discuss the top 10 Life Safety Code deficiencies cited by IDPH
- Review the NFPA 101 - Life Safety Code, 2000 edition references
- Provide tips to prepare for survey
- Identify common mistakes
- Questions



# Survey Process

- In September of 2021, IDPH notified Assisted Living and Shared Housing Facilities that IDPH would begin conducting annual Life Safety/ Physical Environment surveys
  - The Office of the State Fire Marshall used to conduct these surveys
- Survey is conducted per the Assisted Living and Shared Housing Establishment Code – 77 IAC 295, Section 295.1070
- Survey Team is comprised of Physician and Nurse surveyors, Architects, and Engineers

# NFPA 101– Life Safety Code (LSC) 2000 ed

- Facility Types
- Small Facilities
  - Sleeping accommodations for not more than 16 residents
  - Must meet LSC Section 32.2
- Large Facilities
  - Sleeping accommodations for 16 or more residents
  - Must meet LSC Section 32.3

# Top Life Safety Code Deficiencies

- Means of Egress – 32.1.4
  - No means of escape or means of egress is considered as meeting the minimum criteria for acceptance unless emergency evacuation drills are regularly conducted using that route.
- What is the means of egress?
  - Corridors
  - Exit Stairs
  - Exits to the outside
    - Including windows

# Top Life Safety Code Deficiencies



- Evacuation Drills – 32.7.3
- Emergency egress and relocation drills must be conducted not less than 6 times per year – on a bi-monthly basis.
- Not less than 2 drills must be conducted when residents are sleeping
- Permitted to be announced in advance to residents
- Drills must involve the actual evacuation of all residents to an assembly point specified in the emergency plan
- Exits not used in drills will not be credited in meeting the Code



# Top Life Safety Code Deficiencies

- Evacuation Drills – 32.7.3
  - Exception #1 – Exiting from windows is NOT required
    - Opening the window and signaling for help is acceptable
  - Exception #2 – If the facility's evacuation capability classification is impractical – residents who can't assist in their own evacuation or who have special health problems are not required to actively participate.
    - Becomes a defend in place situation – your fire response plan must address how these patients are handled
- 3 Evacuation classifications
  - Prompt Evacuation Capability
  - Slow Evacuation Capability
  - Impractical Evacuation Capability

# Top Life Safety Code Deficiencies

- Be familiar with ALL the requirements of Section 295.2040 Disaster Preparedness
- [Section 295 \(ilga.gov\)](https://www.ilga.gov/legislation/295/0295.htm)
- Ensure staff training occurs on all shifts, and they know their roles for emergency response
- Actual evacuation from various exits, residents need to be familiar with their two means of egress

# Top Life Safety Code Deficiencies

- Ensure that you use the CMS Evacuation Capability tool to evaluate all your residents
- <https://www.cms.gov/Medicare/CMS-Forms/CMS-Forms/downloads/cms2786m.pdf>

# Top Life Safety Code Deficiencies

- Establish relocation points for various type of emergencies such as tornado, weather related, and fire
- Disaster plan should be based on a hazard assessment, such as power outages, and flooding
- Don't forget to evaluate EACH drill, what did you learn, what training and policy changes will be made as a result
- Evaluate the effectiveness of the training and the plan



# Top Life Safety Code Deficiencies

- Hazardous Areas
  - Rooms or spaces used to store combustible materials
    - Cartoned storage
    - Food or household maintenance items – wholesale quantities – bulk
    - Mass storage of resident's belongings
  - Rooms that contain furnaces, heating equipment, cooking equipment or laundry are NOT classified as hazardous based solely on the equipment
    - Conditions of the room or space will determine hazard level



# Top Life Safety Code Deficiencies

- Hazardous Area Protection
    - On the same floor or abutting a primary means of escape or sleeping rooms
  - 1-hr fire resistance rated separation with a 45-minute self-closing and positive latching door and smoke detection
- OR
- Automatic sprinkler protection with smoke tight construction and a self or automatic closing door

# Top Life Safety Code Deficiencies

- Hazardous Area Protection
    - Other locations
  - 1/2-hr fire resistance rated separation with a self or automatic closing door (1 3/4-inch solid wood door) and connected smoke detection
- OR
- Automatic sprinkler protection

# Top Life Safety Code Deficiencies

- You can create hazardous areas i.e., vacant resident units or offices
- Do not wedge open fire rated doors
- Do not store flammables outside a proper cabinet, i.e., gasoline





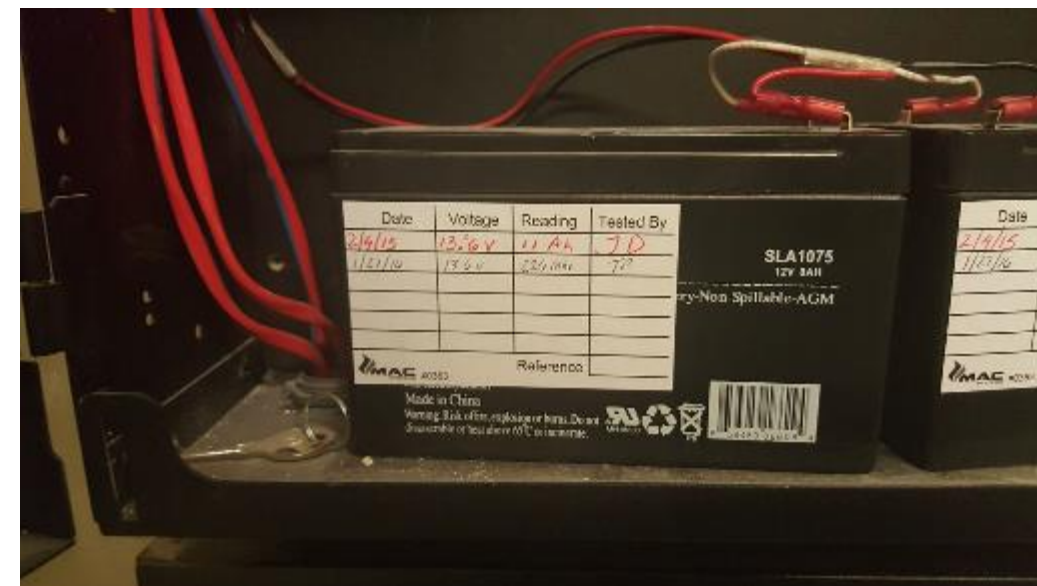
# Top Life Safety Code Deficiencies

- Fire Alarm Systems
- Manual fire alarm system is required with occupant notification
  - Fire Alarm Systems must meet NFPA 72
  - Fire Alarm Systems have Inspection, Testing, and Maintenance (ITM) requirements that will be evaluated during the document review session
- Unless the building is fully sprinklered – smoke alarms are required in all living units
- Single-station smoke alarms are required in all sleeping rooms

# Top Life Safety Code Deficiencies

- Blocked or missing fire alarm devices such as smoke detectors and pull stations
- Dirty smoke detectors
- No plan for fire alarm system outages that last longer than 4 hours – alternate or interim life safety measures check with your insurance company, they may require this as well
- No fire watch policy or staff trained how to perform fire watch
- Fire alarm control panel batteries not tested
- READ your testing reports, ensure that all the deficiencies noted are corrected, don't just file the reports away

# Top Life Safety Code Deficiencies



Building: [REDACTED] Control Panel: 1 - Notifier  
MFS-3030D

The Discrepancy Report consolidates each discrepancy listed within the various Testing sections of your Inspection. Discrepancies are listed by Category, and grouped by device type. The description of the problem is provided and where appropriate, code references are listed for your convenience. Any item that was inspected that is listed on the Consumer Product Safety Commission's website and is subject to a recall by the manufacturer is included.

| Device Type                                     | Manufacturer  | Model Number       | Date    | Qty                           |
|---|---|--------------------|---------|-------------------------------|
| <b>Items listed for Recall by Manufacturer</b>  |   |                    |         |                               |
| No recalled items found during this inspection. |   |                    |         |                               |
| ScanID  | Location  | Problem            | Address | Reference                     |
| <b>Control</b>                                  |   |                    |         |                               |
| <b>Battery</b>                                  |   |                    |         |                               |
| 52906893  | Basement Storage Rm   | Date Expired       |         | NFPA72 Table 14.4.3.2 (9)(11) |
| 52906889  | Basement Storage Rm   | Date Expired       |         | NFPA72 Table 14.4.3.2 (9)(11) |
| 52906895  | Basement Storage Rm   | Date Expired       |         | NFPA72 Table 14.4.3.2 (9)(11) |
| <b>Initiating</b>                               |   |                    |         |                               |
| <b>Pull Station</b>                             |   |                    |         |                               |
| 52906927  | Basement by Panel   | Key Would Not Work |         |                               |
| 52906930  | Basement by Sprinkler Rm  | Key Would Not Work |         |                               |
| 52906926  | Basement Lounge Rm  | Key Would Not Work |         |                               |
| <b>Code References</b>                          |   |                    |         |                               |
| NFPA72 Table 14.4.3.2 (9)(11)                   | Batteries shall be replaced in accordance with the recommendations of the alarm equipment manufacturer or when the recharged battery voltage or current falls below the manufacturer's recommendations. |                    |         |                               |



# Top Life Safety Code Deficiencies

- Automatic Sprinkler Protection
- Required in Assisted Living Facilities
- All sprinkler systems must be Inspected, Tested and Maintained per NFPA 25
- Sprinkler heads must be clean – free of debris
  - Regular part of EVS activities
  - Checked on environmental tours
- Wires are not permitted on sprinkler piping
  - Above ceiling inspections to confirm conditions



# Top Life Safety Code Deficiencies

- No plan for sprinkler system outages that last longer than 4 hours – alternate or interim life safety measures check with your insurance company, they may require this as well
- No fire watch policy or staff trained how to perform fire watch
- Dirty sprinkler heads, obstructed sprinkler heads
- Missing spare sprinkler heads and wrench
- READ your testing reports, ensure that all the deficiencies noted are corrected, don't just file the reports away

# Top Life Safety Code Deficiencies



# Top Life Safety Code Deficiencies

- Corridor Protection
- Corridor walls must separate sleeping rooms by smoke partitions when the building is fully sprinklered
  - No louvers, operable transoms, transfer grills, or other air passages are permitted
  - Only approved HVAC installations are permitted
- Sleeping room doors must be a minimum of 1 3/4-inch-thick wood core construction (or equal)
- Doors must be positive latching
  - Doors must be automatic or self-closing if the building is not fully sprinklered



# Top Life Safety Code Deficiencies

- Doors to hazardous areas wedged open
- Louvers/transoms in the walls or doors in exit access corridors





# Top Life Safety Code Deficiencies

- Means of Egress
- Must be free, clear and unobstructed
- Must be properly signed and illuminated
- Exit discharge must be maintained to the public way
- Proper locking configurations



# Top Life Safety Code Deficiencies

- Required Exit walking surface does not extend to the public way
- The exterior walkway must also be maintained, i.e., snow removal





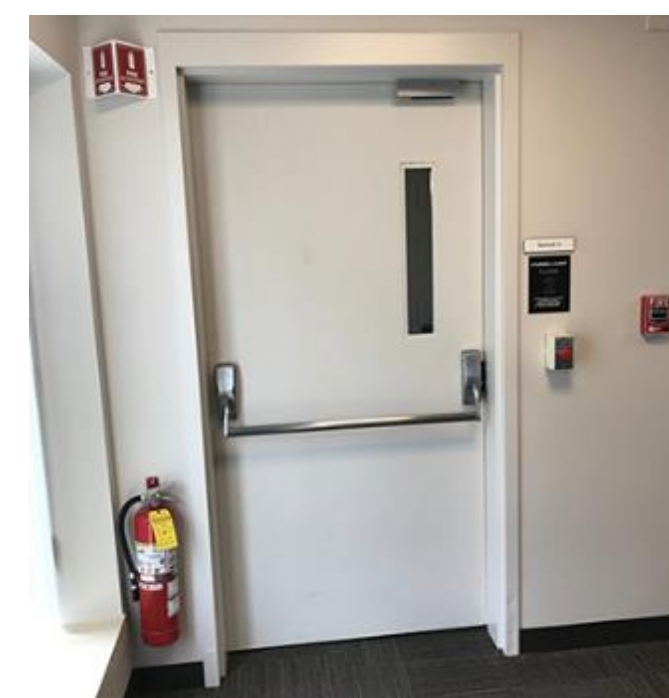
# Top Life Safety Code Deficiencies

- Exit lights out, missing exit signs, incorrect exit signs
- More than one delayed egress in a path of egress i.e., memory care



# Top Life Safety Code Deficiencies

- Fire Barriers
- Fire barriers are used to separate vertical openings in buildings such as exit stairs and plumbing and electrical shafts
- Fire barriers must be 1-hour fire resistance rated when connecting 3 or fewer stories and 2-hour fire resistance rated when connecting 4 or more stories
- Fire barriers must be protected with rated doors that automatic or self-close and positive latch





# Top Life Safety Code Deficiencies

- Firestop Products must have the proper UL rating for the type of fire rated barrier
- Accurate set of life safety drawings to properly identify all required fire barriers
- Fire doors that don't properly close and positively latch
- As per NFPA fire door inspections must be performed by "qualified individuals", doesn't mean a contractor or consultant

# Top Life Safety Code Deficiencies

- Fire barriers should be regularly inspected via a Barrier Management Plan
- Recommend using an Above Ceiling Permit program to reduce the chance of holes not being properly fire stopped



# Top Life Safety Code Deficiencies

- Emergency Plan
  - Every facility is required to have an emergency plan that addresses what to do in a fire, staying in place, evacuating to areas of refuge, and evacuating from the building
- Plan Specifics:
  - Must include Special Staff Response
  - Must include Fire Protection Procedures needed to ensure the safety of any resident – must be amended or revised for any resident with special needs
  - Employees must be instructed of duties and kept informed of responsibilities
  - Plan must be reviewed by staff not less than every 2 months
  - Copy must be readily available

# Top Life Safety Code Deficiencies

- Limited staff knowledge on proper fire response and how to use a fire extinguisher
- Fire drills are not performed at night
- The actual fire alarm must be activated for the drill to count
- If there is a cooking kitchen on the premises, they must also participate in a fire drill that occurs in the kitchen



# Top Life Safety Code Deficiencies

- Smoking
- The facility is required to have a smoking policy that is actively enforced
- All staff should be trained on the smoking policy and understand how to enforce it
- When smoking is permitted, noncombustible safety-type ashtrays or receptacles must be provided in convenient locations

# Top Life Safety Code Deficiencies

- Common mistakes – no ashtrays, field conditions conflict with policy



# Top Life Safety Code Deficiencies



# Resources

- Bravura Facility Management, LLC.
  - Lamar Davis – 773-619-4346 – [safetyengineering@outlook.com](mailto:safetyengineering@outlook.com)
- Code Consultants, Inc.
  - Anne Guglielmo – 708-781-9147 – [anneg@codeconsultants.com](mailto:anneg@codeconsultants.com)
- Facility Assessment – Policy Review – Staff Training – Survey Support





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**MARCH 7-8, 2023**

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