

SYSTEMS OUT OF SERVICE

Introduction

Time is of the essence when a health care facility is affected by a fire or other emergency. When a required fire protection system is out of service, valuable early warning and fire suppression capabilities are severely compromised.

Federal regulations, as well as both the 2015 MSFC and NFPA 101(12), contain provisions dealing with situations, preplanned or otherwise, in which a required fire protection system (e.g. fire alarm or fire sprinkler system) is out of service. Essentially, the expectation is that, under such circumstances, either the building be evacuated or an approved fire watch provided. A properly trained fire watch, coupled with an extra vigilant staff, can make a significant difference in determining whether or not a facility can continue to be occupied during such an impairment.

The Centers for Medicare and Medicaid Services (CMS) requires that each healthcare facility have a written procedure in place for the handling of fire alarm and/or fire sprinkler system outages. Lack of an acceptable procedure is a citable deficiency. This document is intended to provide guidance to healthcare facility staff charged with the responsibility of developing and implementing site-specific fire watch policies.

Notification(s)

MSFC(15), Sec. 901.7 specifies that when a required fire protection system is out of service for any length of time, the local fire code official (i.e. fire chief or fire marshal) must be notified immediately and, where required by the fire code official, the building must either be evacuated or an approved fire watch provided.

NFPA 101(12), Sec. 9.6.1.6 specifies that where a required fire alarm system is out of service for more than 4 hours in a 24-hour period, the authority having jurisdiction (AHJ) must be notified and the building evacuated or an approved fire watch provided for all parties left unprotected by the shutdown until the fire alarm system has been returned to service. According to an Annex note to Sec. 9.6.1.6, the term *out of service*, in the case of this section, is intended to imply that a significant portion of the fire alarm system is not functioning (e.g. an entire initiating device, signaling or notification appliance circuit), not just a single device or appliance.

Federal regulations require that when a fire sprinkler system is shut down for more than 10 hours, the building or portion thereof affected by the outage must be evacuated or a fire watch established until the system is back in service – see 42 CFR 482.41(b)(8) for hospitals or 42 CFR 483.70(a)(8) for long term care facilities. This is similar to NFPA 25(11), Sec. 15.5.2(4), which addresses situations in which a required fire protection system is out of service for more than 10 hours in a 24-hour period.

For federal Medicare/Medicaid certification purposes, the AHJ is the Deputy State Fire Marshal Inspector assigned to the area in which the facility is located. Notification of the AHJ needs to include information about implementation of a fire watch (or building evacuation, if that proves necessary), what is being done to correct the condition and when the system is expected to be restored to proper operation. *This notification is in addition to that of the local fire code official.*

Notification should also be made to the facility's insurance carrier in accordance with that carrier's requirements. For preplanned impairments, the facility's insurance carrier should be notified of the extent and expected duration of the impairment. In addition, tags should be placed at each fire department connection, sprinkler system control valve, fire alarm control unit and fire alarm annunciator indicating that the system, or part thereof, has been removed from service.

Additional safety measures

The following safety measures should be implemented immediately upon learning that a required fire protection system is out of service and should remain in place until the affected system has been restored to proper operation:

1. Notify all staff and the facility's monitoring company that the system is out of service;
2. Prohibit all smoking and work involving cutting or welding on the premises (unless such work has been preauthorized and is taking place in an area that is properly fire separated from the remainder of the facility);
3. If the building's fire alarm sounding devices are inoperable, devise a method to notify all staff in case of emergency (bells, whistles, bullhorns or similar devices could serve this purpose); and
4. If the building's fire alarm system is out of service:
 - a. Close all smoke and fire doors, and
 - b. Unlock all locked exit doors to allow for immediate egress in case of emergency.

Fire watch personnel

Fire watch duties may be performed by facility staff, or an outside agency (e.g. fire department, security company, etc.) can be hired to perform the service. In any case, persons serving as a fire watch may have no other duties assigned to them while the affected fire protection system is out of service. Fire watch personnel should be specially trained in identifying and controlling fire hazards, detecting early signs of unwanted fire, the use of portable fire extinguishers, and in occupant and fire department notification techniques.

Fire watch duties

At a minimum, fire watch personnel should:

1. Be provided with at least one approved means for notification of the fire department (e.g. 2-way radio or cell phone).
2. Perform continuous tours of the building such that each portion of the building affected by the impairment is checked at not less than 30-minute intervals (more than one person may be needed to accomplish this). These tours need to be documented in a log. In addition to watching for and promptly reporting any incidents of fire, visible smoke or strong smell of smoke or other unwanted odors, the fire watch should also ensure while on tour that:
 - Portable fire extinguishers are in place, unobstructed and in proper operating condition;
 - Corridors and exits are free and clear of storage and all other obstructions;
 - Exit and stairwell doors are clear and fully operational;
 - EXIT signs are visible and properly illuminated;
 - Fire doors, smoke barrier doors and hazardous area doors are kept closed and latched (i.e. not tied, wedged or blocked open in any fashion);
 - Oxygen cylinders/containers not in use are properly stored;
 - Electrical hazards are promptly reported and remedied;
 - No smoking or work involving cutting or welding or the use of flammable/combustible liquids is taking place (unless such work has been preauthorized and is taking place in an area that is properly fire separated from the remainder of the facility); and
 - Trash and other unnecessary accumulations of combustibles are promptly removed from the building.

Remember.....

It is important that fire watch personnel be given reasonable periodic rest breaks.

System(s) restored to service

Facility staff, the fire code official, and the facility monitoring company and insurance carrier should be promptly notified when the affected fire protection systems have been restored to proper operation. In addition, any tags placed on fire department connections, fire sprinkler system control valves, fire alarm control units and/or fire alarm annunciator panels should be promptly removed.

Preplanned impairments

A fire alarm or fire/smoke detection system is typically not considered to be out of service or impaired during scheduled and controlled events involving testing of such systems (e.g. “walk test” or “alarm bypass”) so long as a properly trained person is present at the main fire alarm control panel for the full duration of the test that can immediately restore the system to proper operation on receipt of a signal at the panel from an initiating device other than the specific device being tested and the person at the panel and the person conducting the actual testing are in constant communication with each other (e.g. via 2-way radio or cell phone). Under these circumstances, the person at the panel and the person conducting the testing are, in effect, the “fire watch”. It must be noted, however, that this is a judgment call on the part of the AHJ.

As noted earlier, it has been determined that building evacuation or a fire watch is not required unless the building fire sprinkler system is shut down for more than 10 hours in a 24-hour period. This is based on the understanding that most system testing and maintenance extends over an 8-hour period of time and occurs during a normal work day with sufficient staff levels to provide appropriate monitoring and assure patient safety from fire, and that during the outage, additional staff with expertise in sprinkler system operation are present to address sprinkler system problems. In addition, during a sprinkler system outage, the fire alarm system is typically still functioning to detect a fire.

Related code references

State licensure requirements that apply when a required fire protection system is out of service can be found in MSFC(15), Sec. 901.7.

Additional federal certification requirements that apply when a water-based fire protection system (e.g. fire sprinkler system) is out of service can be found in Chapter 15 of NFPA 25(2011 edition), *Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems*.

Fire watch policy

As previously mentioned, CMS expects health care facilities to have a written procedure in place for the handling of fire alarm and/or fire sprinkler system outages. To help avoid confusing staff, it is suggested that your facility have two separate policies – one for a fire alarm system out of service and another for a fire sprinkler system out of service. Each policy should be specifically tailored to your facility (using a generic or “boiler plate” policy could result in a federal deficiency).

Fire watch log

Almost as important as conducting fire watch tours is documenting the fact that they occurred. Your facility should also have a fire watch log that fire watch personnel are expected to fill out during their tours.

It is important that at least two people in your facility know where your fire watch logs are kept to increase the likelihood that they can be readily provided if requested during an inspection. It is recommended that these logs be maintained for at least three years.