

LTC Life Safety Code Trend Report

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Survey Statistics

Number of recertification surveys reviewed: 32

Number of revisit surveys not passed: 0

Number of recertifications with deficiencies: 32 or 100%

Number of deficiency free recertifications: 0

Average number of deficiencies: 4.9

Life Safety Code Regulation Reminders:

LSC regulations allow for silent fire drills during sleeping hours. The fire drill must be documented as completed between the hours of 9 p.m. and 6 a.m. However, you must initiate the fire alarm the following day to ensure that the signal from the initiating device is being received by the panel within 90 seconds. There are times when K712 is cited for failure to document that the fire alarm was sounded the day after a silent drill to ensure proper functioning. In addition, drills coded as silent drills outside of the approved hours will also result in noncompliance.

Please review the [Holiday Memo](#) from the State Fire Marshal as you begin decorating for the upcoming holidays!

Emergency Preparedness Regulation Reminder:

A friendly reminder that you are required to complete both a full-scale or community-based exercise of your emergency preparedness plan and an additional exercise which can be another full-scale or community-based exercise or a tabletop exercise within the last 12-months. Ensure that you have documentation of attempts to facilitate participating in a community-based exercise. Also, the 12-month requirement is a rolling period. If you completed your last full-scale and/or tabletop exercise on December 1 of the previous year, another will need completed prior to December 1 of this year.

I am in the process of reviewing the Life-Facility Memorandum of Understanding. If you are interested in joining this, please reach out to me for details.

Check out our [LSC Resource Page](#)
on our LAI website!

Top LSC Deficiencies for October 2024

K712 – FIRE DRILLS

K918 – ESSENTIAL ELECTRICAL SYSTEM

K321 – HAZARDOUS AREAS - ENCLOSURES

K921 – ELECTRICAL EQUIPMENT – MAINTENANCE & TESTING

K291 – EMERGENCY LIGHTING

K133 - Multiple Occupancies - Construction Type

- Cited 2 times for gaps/penetrations in the fire wall between the nursing home and another level of care.

K161 - Building Construction - Type and Height

- Cited 3 times for:
 - Penetration in the wall.
 - Porches attached to the building had combustible wood coverings which are not allowed in non-combustible structures.
 - Penetration in the ceiling.

K200 - Means of Egress Requirements - Other

- A stairwell had multiple items stored that obstructed the exit enclosure.

K222 - Egress Doors

- Cited 2 times for:
 - A delayed egress door without appropriate signage.
 - Two-motion twist type locks that possibly prevent quick egress in an emergency.

K223 - Doors with Self-Closing Devices

- Cited 1 time when fire doors did not fully close when tested.

K291 - Emergency Lighting

- Cited 8 times for:
 - Medication room lights were operated by a switch without other emergency lighting present.
 - 3 times for missing monthly functional testing.
 - 4 times for missing annual 90-minute testing.
 - 3 times when emergency lights did not illuminate when tested.

K311 - Vertical Openings

- Cited 1 time when elevator doors did not fully close and latch.

K321 - Hazardous Areas - Enclosure

- Cited 11 times for:
 - 6 times when self-closing devices were not installed on hazardous rooms.
 - 3 times when hazardous room doors did not fully close and latch.
 - 2 times when a door with a self-closing device was held open.

K324 - Cooking Facilities

- Cited 5 times for:
 - 3 times when inspections were not completed every 6 months as required.
 - Residential stoves were present in neighborhoods without a hood suppression system present.
 - An automatic burner was not functioning.
 - A deficiency was identified on the hood suppression system inspection that was not corrected.

K325 - Alcohol-Based Hand Rub (ABHR) Dispenser

- Cited 1 time when an ABHR dispenser was installed directly above an electrical outlet.

K341 - Fire Alarm System - Installation

- Cited 3 times for:
 - 2 times when the fire alarm system breaker was not mechanically protected.
 - An enclosed courtyard did not have a horn/strobe installed to notify occupants of the fire alarm activation.
 - The kitchen hood suppression system had excessive grease buildup.

K345 - Fire Alarm System - Testing and Maintenance

- Cited 7 times for:
 - 5 times when the fire alarm system was not inspected every 6 months as required.
 - The fire alarm was not activated monthly to ensure the initiating device transmitted the signal to the panel within 90 seconds.
 - The fire alarm system inspection did not include all devices interconnected to the fire alarm system.

K346 - Fire Alarm - Out of Service

- Cited 2 times for:
 - The policy did not state that fire watch rounds were continuous, and the assigned individual would be dedicated.
 - It was not indicated on the policy that contacts would be notified at the beginning and end of a fire watch.

K347 - Smoke Detection

- Cited 2 times for not having smoke detector sensitivity testing in the last two years.

K353 - Sprinkler System - Maintenance and Testing

- Cited 6 times for:
 - The air compression of the dry sprinkler system was not hard wired into the electrical system.
 - No documentation of completing monthly fire pump inspections.
 - 2 times when inspections of the sprinkler system were not completed on a quarterly basis.
 - Missing escutcheon ring around a sprinkler head.
 - Dry sprinkler heads were not replaced within 10 years as required.
 - The air compressor appeared to have a leak as it was activated every 15 minutes.
 - Different sprinkler heads were installed in the same area.
 - Storage of items within 18-inches of sprinkler heads.
 - Dirty/dusty sprinkler heads.

K354 - Sprinkler System - Out of Service

- Cited 5 times for the policy missing several required components.

K355 - Portable Fire Extinguishers

- Cited 5 times for:
 - 2 times when fire extinguishers were mounted more than five feet from the floor.
 - Missing monthly visual inspections.
 - Access to the portable fire extinguisher was obstructed.
 - Annual maintenance of fire extinguishers was not completed.

K362 - Corridors - Construction of Walls

- Cited 2 times for:
 - A penetration around a sprinkler head.
 - Penetration in a smoke wall.

K363 - Corridors - Doors

- Cited 6 times for:
 - 2 times for gaps between the doors and frame.
 - 4 times when doors would not fully close and latch.
 - Penetration in a door.
 - 2 times when doors were held open with wedge devices.

K372 - Subdivision of Building Spaces - Smoke Barrier Construction

- Cited 1 time when there was a penetration in the smoke barrier.

K374 - Subdivision of Building Spaces - Smoke Barrier Doors

- Cited 2 times for:
 - An unapproved expanding spray foam was used to prevent a gap in the door.
 - A smoke door did not fully close.

K511 - Utilities - Electric & Gas

- Cited 2 times for:
 - Exposed electrical wiring.
 - No GFCI outlet was installed next to a sink in the beauty shop.

K521 - HVAC

- Cited 2 times for:
 - Using duct tape on the dryer vent.
 - An unsecured plate on the back of the dryer allowed lint to escape the exhaust system.

K711 - Evacuation and Relocation Plan

- Cited 1 time for the plan not including a safe evacuation location.

K712 - Fire Drills

- Cited 13 times for:
 - 12 times for missing drills.
 - 2 times when drills were conducted at approximately the same time.
 - Not all documentation that is required was included.

K741 - Smoking Regulations

- Cited 2 times for:
 - A self-closing metal container for discarding smoking materials was not available.
 - 4 times when smoking materials were discarded on the ground.
 - Trash was discarded in the smoking receptacle.

K761 - Doors - Maintenance, Inspection and Testing

- Cited 1 time when annual fire/smoke door inspections were not completed.

K781 - Portable Space Heaters

- Cited 1 time when a prohibited space heater was present in a resident room.

K914 - Electrical Systems - Maintenance and Testing

- Cited 6 times for:
 - 3 times when electrical receptacle testing was not completed in the last 12 months.
 - Hospital-grade receptacles were not tested when installed.
 - Multiple breakers were noted in the off position and covered with red tape.
 - The documentation for testing did not list each outlet.

K918 - Essential Electrical Systems

- Cited 11 times for:
 - 2 times for not completing EES main and feeder circuit breaker testing and inspection in the last 12 months.
 - A diesel fuel quality test was not done in the last 12 months.
 - A remote emergency stop for the generator was not present.
 - 5 times for missing weekly inspections.
 - 4 times for missing monthly load tests.
 - A natural gas reliability letter was not available.
 - Leaves were accumulated in the generator area.
 - The full load test every 3 years was not completed.
 - An annual load bank test was not completed.
 - Documentation did not include:
 - 2 times for the transfer switch operation during monthly test.
 - Start and stop times for monthly testing.

K920 - Electrical Equipment - Power Cords and Extension Cords

- Cited 7 times for:
 - 5 times for surge protectors being used inappropriately.
 - 3 times when extension cords were used.
 - Christmas type lights were used in a series in a resident's room.

K921 - Electrical Equipment - Maintenance and Testing

- Cited 9 times for:
 - 9 times when PCREE testing was not completed.
 - A policy on PCREE testing was not available for review.

K923 - Gas Equipment - Cylinder and Container Storage

- Cited 5 times for:
 - 4 times when combustible materials were stored within five feet of oxygen cylinders.
 - Oxygen tanks were not secure.

K926 - Gas Equipment - Training

- Cited 1 time when an oxygen tank was not stored securely.

Emergency Preparedness E-Tags



E006 - Plan Based on All Hazards Risk Assessment

- Cited 1 time when there was not a policy on all hazards identified in the hazard risk assessment.

E026 - Roles Under a Waiver Declared By the Secretary

- Cited 2 times when a policy on 1135 waivers was not available.

E036 - EP Training & Testing

- Cited 1 time when all risks identified did not include a policy and communication processes.

E039 - EP Testing Requirements

- Cited 6 times for:
 - 3 times for not completing a full scale and additional exercise in the last 12 months.
 - 2 times when an additional exercise was not completed.
 - A full-scale exercise was not completed.