

# LTC Life Safety Code Trend Report

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# **Survey Statistics**

Number of recertification surveys reviewed: 44

Number of revisit surveys not passed: 1 - resulted in denial of payment

Number of recertifications with deficiencies: 41 or 93%

Number of deficiency free recertifications: 3 (7%)

Average number of deficiencies: 4.7

#### **Life Safety Code Regulation Reminders:**

During the last few months there have been several providers that have not renewed the annual waivers they have based on LSC compliance. A friendly reminder to include this on your calendar to ensure you renew these on a timely basis prior to the expiration to avoid deficiencies.

K321 - Hazardous Areas. Common deficiencies include when a hazardous area does not have a self-closing device installed. Hazardous areas include storage rooms that are greater than 50 ft<sup>2</sup> and contain storage of combustible materials. In addition, doors that have self-closing devices should not be held open (i.e. with door wedges, carts, buckets, etc).

#### **Emergency Preparedness Regulation Reminder:**

If you have a change in key leadership, ensure that your policy and procedures within your Emergency Preparedness Plan (EPP) are updated. Pay special attention to those with names and contact information to ensure they are updated with the new leadership's information.

I will be reviewing/updating the Memorandum of Understanding (MOU) agreement between several of our members in the near future! If you would like to be included in this MOU, please reach out to me and I can send you the agreement and add you to the list. This includes both SNF and AL providers.

Congratulations to Faith Lutheran Home and MercyOne Centerville on deficiency free LSC surveys!!

Check out our <u>LSC Resource Page</u> on our LAI website!

# Top LSC Deficiencies for September 2024

K918 – ESSENTIAL ELECTRICAL SYSTEM

K353 – SPRINKLER SYSTEM – MAINTENANCE AND TESTING

**K712 - FIRE DRILLS** 

K345 - FIRE ALARM SYSTEM - TESTING & MAINTENANCE

K324 – COOKING FACILITIES

### K161 - Building Construction - Type and Height

Cited 1 time for a penetration in the ceiling.

### K211 - Means of Egress - General

 Cited 1 time when a scale was in the corridor and protruded in the corridor, reducing width to the exit access.

# K222 - Egress Doors

- Cited 3 times for:
  - An exit door required excessive force to open.
  - A push button lock door knob was installed backwards on the bathroom door which would restrict egress.
  - A delayed egress door did not have appropriate signage.
  - o A delayed egress door did not open with the fire alarm testing.

## K232 - Aisle, Corridor, or Ramp Width

- Cited 2 times for:
  - Multiple items being stored in the hallway which would limit the exit path width.
  - A retractable computer arm was not functioning properly and protruded in the hall approximately 2 feet.

# K223 - Doors with Self-Closing Devices

 Cited 3 times for fire rated doors not fully closing and positively latching when tested.

### K271 - Discharge from Exits

 Cited 1 time when the stairwell terminated to the first floor instead of an exterior door which was previously under a waiver.

## K291 - Emergency Lighting

- Cited 7 times for:
  - 2 times for missing monthly functional testing.
  - 3 times for missing annual 90-minute testing.
  - The medication room light was controlled by a switch and did not have any other emergency lighting.
  - o 2 times when emergency lights did not illuminate when tested.

# K293 - Exit Signage

Cited 1 time when an exit sign did not illuminate when tested.

#### K321 - Hazardous Areas - Enclosure

- Cited 6 times for:
  - o 2 times when a door with a self-closing device was held open.
  - 4 times when a door did not have a self-closing device that should have.
  - 3 times when the door to a hazardous area did not fully close.

### K324 - Cooking Facilities

- Cited 9 times for:
  - 4 times for missing hood suppression system inspections.
  - A pressure test was not completed on the hood suppression system holding tank.
  - 3 times when the hood suppression system was painted, which voided the UL rating.
  - Excessive grease buildup.
  - A deficiency identified on an inspection report was not corrected.

# K341 - Fire Alarm System - Installation

• Cited 2 times for not having a mechanical protective lock on the fire alarm system breaker.

# K345 - Fire Alarm System - Testing and Maintenance

- Cited 11 times for:
  - Smoke detector noted hanging by wires.
  - Doors did not automatically close when tested.
  - o Batteries were not replaced in the fire alarm system.
  - 3 times for missing fire alarm system inspections.
  - The inspections did not list all items individually.
  - A smoke damper test was not completed within the last 4 years.
  - The fire alarm system was in trouble mode during on-site survey.
  - A strobe failed when tested.
  - A deficiency was identified on the inspection which was not corrected.

#### K346 - Fire Alarm - Out of Service

- Cited 3 times for:
  - Not having a fire alarm system out of service policy.
  - 2 times for the policy not including contact information for the fire department.

#### K347 - Smoke Detection

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

### K351 - Sprinkler System - Installation

- Cited 2 times for:
  - Installation of quick response and standard sprinkler heads in the same room.
  - The air compressor was not hard-wired into the electrical system.

### K353 - Sprinkler System - Maintenance and Testing

- Cited 18 times for:
  - o 3 times for not completing a five-year internal obstruction inspection.
  - 4 times for missing quarterly inspections.
  - 7 times for sprinkler heads with excessive dust/lint.
  - 4 times for corroded sprinkler heads.
  - 3 times when items were stored within 18 inches of sprinkler heads.
  - There was not a cabinet installed near the sprinkler riser as required.
  - Missing escutcheon ring.
  - No hydraulic name plate present.
  - Sprinkler wrenches for the sprinkler heads installed in the building were not found in the cabinet near the sprinkler riser.
  - A deficiency was identified on inspection that was not corrected.
  - Paint was noted on a sprinkler head.
  - Missing documentation of monthly fire pump inspections.

### K354 - Sprinkler System - Out of Service

- Cited 5 times for:
  - Failure to have a policy on the sprinkler system being out of service.
  - The policy stated out of service for four or more hours instead of 10 as required.
  - All emergency impairments were not listed in the policy.
  - The policy did not include contact information for:
    - DIAL
    - The fire department

### K355 - Portable Fire Extinguishers

- Cited 3 times for:
  - Failure to have annual maintenance completed on the extinguishers.
  - Monthly inspections were missing.
  - A six-year internal examination was not completed.

#### K362 - Corridors - Construction of Walls

Cited 2 times for holes in walls in the hallways.

#### K363 - Corridors - Doors

- Cited 8 times for:
  - o A gap was noted between the door and the door frame.
  - A penetration was noted in the door.
  - 5 times when the door would not fully close.
  - o The bathroom door was obstructing closure of the room door.
  - o 2 times when doors were held open with wedges.

# K371 - Subdivision of Building Spaces - Smoke Compartments

Cited 1 time when a smoke barrier door did not close.

# K374 - Subdivision of Building Spaces - Smoke Barrier Doors

• Cited 1 time for penetration around an escutcheon ring.

#### K511 - Utilities - Electric & Gas

- Cited 5 times for:
  - o 3 times when items were stored within three feet of an electrical panel.
  - An outlet had a broken cover plate.
  - o A junction box was open which exposed electrical wires.

#### K521 - HVAC

Cited 4 times for using duct tape on the dryer vent.

### K711 - Evacuation and Relocation Plan

- Cited 3 times for:
  - 2 times when the safety plan did not include all types of extinguishments in the building.
  - o The plan did not include a safe evacuation location.

### K712 - Fire Drills

- Cited 12 times for:
  - 8 times for missing drills.
  - o 6 times when drills were conducted at approximately the same time.

### K741 - Smoking Regulations

- Cited 8 times for:
  - 4 times for not having a self-closing metal container for discarding smoking materials.
  - 4 times when smoking materials were discarded on the ground.
  - 2 times when trash was discarded in the smoking receptacle.

# K761 - Doors - Maintenance, Inspection and Testing

- Cited 8 times for:
  - o 2 times when fire/smoke doors did not fully close.
  - 4 times for failure to complete annual fire door inspections.
  - Rolling fire doors were held up with pliers and sticks which would prohibit them from closing when the fire alarm is activated.

# K781 - Portable Space Heaters

 Cited 1 time when a resident had an artificial fireplace that the staff were unsure if the heating element was disconnected.

# K911 - Electrical Systems - Other

Cited 1 time when outlets in the beauty shop were not GFCI protected.

# K914 - Electrical Systems - Maintenance and Testing

- Cited 7 times for:
  - 4 times when electrical receptacle testing was not completed in the last 12 months.
  - The testing documentation did not include the actual retention value.
  - Items were stored within three feet of an electrical panel.
  - Receptacles failed testing but were not replaced.

# K918 - Essential Electrical Systems

- Cited 20 times for:
  - 5 times for not completing EES main and feeder circuit breaker testing and inspection in the last 12 months.
  - 4 times for not completing a diesel fuel quality test in the last 12 months.
  - o 2 times when there was not a remote emergency stop for the generator.
  - 5 times for missing weekly inspections.
  - 4 times for missing monthly load tests.
  - Testing stated power transfer was greater than 10 seconds.
  - The monthly run time was listed for less than the required 30 minutes.
  - Oil levels were documented monthly instead of weekly.
  - Documentation did not include:
    - 3 times for the transfer switch operation during monthly test.
    - 2 times for weekly inspections missing battery, belts, and hoses.
    - Amperages on each leg during the monthly test.
    - Start/stop meter readings.
    - Several items.

### K920 - Electrical Equipment - Power Cords and Extension Cords

- Cited 7 times for:
  - 4 times for surge protectors being used inappropriately.
  - o 2 times when extension cords were used.
  - A multiplug adaptor was used.

# K921 - Electrical Equipment - Maintenance and Testing

- Cited 3 times for:
  - 2 times when PCREE testing was not completed.
  - The documentation did not include all required items.

# K922 - Gas Equipment - Other

Cited 1 time when an oxygen concentrator was left on and unattended.

# K923 - Gas Equipment - Cylinder and Container Storage

- Cited 5 times for:
  - Empty and full cylinders were commingled.
  - Clothes dryers were present in the oxygen storage room.
  - There was no appropriate signage present for oxygen storage.
  - No signs were present designating empty/full cylinders.
  - Combustible materials were stored within five feet of oxygen cylinders.
  - Oxygen tanks were not secure.

# K926 - Gas Equipment - Training

• Cited 1 time for failure to complete training on oxygen use.

# Emergency Preparedness E-Tags

# E004 - Develop an EP Plan, Review and Update Annually

• Cited 6 times for not reviewing/updating the EPP in the last 12 months.



#### E006 - Plan Based on All Hazards Risk Assessment

Cited 1 time when the EPP did not have a hazard-risk assessment present.

### E020 - Policies for Evacuation and Primary/Alternate Communication

 Cited 1 time for not having a map of the building/grounds that included emergency exits and where to evacuate to.

### E029 - Development of a Communication Plan

 Cited 1 time when the communication plan was not updated or reviewed in the last 12 months.

### E030 - Names and Contact Information

• Cited 1 time when the previous administrator was listed as the contact person in the EPP.

# E039 - EP Testing Requirements

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

