FCIA ICC/NFPA 2018 Code Development Cycle

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Overview

• Updates regarding TJC Accreditation process
• ICC Code Development Cycle
  • FCIA Proposals
  • Other proposals of interest
• NFPA 1/101/5000 Code Change Cycle
SURVEY ANALYSIS FOR EVALUATING RISK (SAFER) MATRIX & POST-SURVEY FOLLOW-UP
Current State

• There are multiple different “taggings” that The Joint Commission uses for EPs
  • Tags EPs as “Direct” versus “Indirect”
  • Tags EPs as “A” category vs. “C” category
  • Measure of Success (MOS) *required or not*
  • Risk Icon *or not*

• These multiple taggings were identified by different groups of staff over the years, and are used for different reasons
  • ESC timeframe
  • Decision rules
  • Intra-Cycle Monitoring
Problem

• The existing multiple EP tagging's require
  • Extensive upkeep
    • some have not been updated in years...
  • Confusing to Joint Commission customers
  • Occasionally contradict each other
• The tagging's attempted to prioritize those EPs that are most critical,
  • However they often result in “one size fits all” follow-up
    • The follow-up is determined by the EP itself rather than the context of the actual observation
Future Vision

• Develop one single, comprehensive method of categorizing the risk associated with standards
Clean Slate....
A New SAFER Concept
A New SAFER Model

**Immediate Threat to Life**
(follows current ITL processes)

- **HIGH**
- **MODERATE**
- **LOW**

- **LIMITED**
- **PATTERN**
- **WIDESPREAD**
Follow-up Actions

Note: If an Immediate Threat to Life (ITL) is discovered during a survey, the organization immediately receives a preliminary denial of accreditation (PDA) and, within 72 hours, must either entirely eliminate the ITL or implement emergency interventions to abate the risk to patients (with a maximum of 23 days to totally eliminate the ITL). Please see the Accreditation Process Chapter within the Comprehensive Accreditation Manual for more information.
## Prioritized Follow-up Action

### Placement of RFI on SAFER Matrix and Follow-Up Activity

<table>
<thead>
<tr>
<th>Evidence of Standards Compliance (ESC) 60</th>
<th>LOW / LIMITED</th>
<th>MODERATE / LIMITED LOW / PATTERN LOW / WIDESPREAD</th>
<th>MODERATE/PATTERN MODERATE/WIDESPREAD</th>
<th>HIGH/LIMITED HIGH/PATTERN HIGH/WIDESPREAD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evidence of Standards Compliance (ESC) 60 - Plus - Additional fields for Leadership Involvement and preventive analysis description</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Pull into surveyor technology for potential review during subsequent surveys</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>
How is Risk Determined?

- Operational definitions and “anchors”
- Surveyor experience and expertise will provide the support to determine the “scope” and “likelihood to harm” for the finding
- Based on the context of the finding
- Discussion amongst the survey team
## Visual Presentation

<table>
<thead>
<tr>
<th>Likelihood to Harm a Patient</th>
<th>Scope of Issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>LIKELY</td>
<td>ISOLATED</td>
</tr>
<tr>
<td>POSSIBLE</td>
<td>PATTERN</td>
</tr>
<tr>
<td>UNLIKELY</td>
<td>WIDESPREAD</td>
</tr>
</tbody>
</table>

**Likelihood to Harm a Patient**

- **LIKELY**
  - APR 09.04.01 EP1
  - IC 01.02.01 EP1
  - IC 02.02.01 EP2
  - PC 03.01.01 EP8

- **POSSIBLE**
  - EC 02.03.05 EP4, EP9
  - MM 03.01.01 EP3
  - PC 03.01.07 EP2
  - WT 04.01.01 EP4

- **UNLIKELY**
  - IC 02.04.01 EP5
  - PC 03.01.03 EP4
  - WT 03.01.04, EP5

**Scope of Issue**

- **ISOLATED** (Observed as a Single Occurrence)
- **PATTERN** (Observed multiple times, potential to impact few/some patients)
- **WIDESPREAD** (Observed multiple times, potential to impact many/all patients)
Benefits of SAFER Matrix

• Focus on Patient Safety: Risk to Patients
  • Critical thinking
    • Potential for harm
      • What if . . .
  • Visual representation of survey
    • More clearly identifies the highest risks
• Aggregate data for standards refinement, improving consistency, etc.
Who does this apply to?

- June 6, 2016: Deemed Psychiatric Hospitals (tailored and non-tailored)

- January 1, 2017: All other programs
Background

• In 1995 the Joint Commission introduced the Statement of Conditions™ (SOC) [electronic in 2006 – 2007]
  • Basic Building Information
  • Plan For Improvement
• Plan For Improvement (PFI) are the documented observation of a deficiency with a Projected Completion Date
• Interim Life Safety Measures (ILSM) are an important part of the PFI process
  • ILSM ensures the building remains safe for occupants as interim measures are implemented
PFI: A Proactive Process

- When a Life Safety Code deficiency is found during survey it results in a survey action:
  - If the organization has a PFI already identifying the deficiency, the finding (RFI) is not written
    - All open PFIs will be imported into the final survey report
    - No ESC required as the PFI has the Projected Completion Date already identified
  - If the organization does not have a PFI identifying the deficiency, then a finding is written as a RFI
Ordinarily a provider or supplier is expected to take the steps needed to achieve compliance within 60-days of being notified of the deficiencies, but the State survey agency may recommend that additional time be granted by the Secretary in individual situations, if in its judgment, it is not reasonable to expect compliance within 60-days, for example, a facility must obtain the approval of its governing body, or engage in competitive bidding.
Survey-related Deficiencies

- All survey-related deficiencies are to be cited as RFIs
- All survey-related deficiencies are to be corrected within 60-days from the end of survey
- If additional time is required the organization must submit a Time Limited Waiver
  - This is managed in Salesforce, and a notification is sent to the organization affirming the TLW request submittal
    - This notification will be used if a MEDDEF or ESC review occurs as Evidence of Compliance (ESC)
Statement of Conditions™

Basic Building Information (BBI)
Plan for Improvement (PFI)

Survey Plan for Improvement (SPFI)
Time Limited Waiver (TLW)
ICC Code Development Cycle

- The groups of code change hearings
  - 2015 – Group A – most of the building code other than structural
    - Code Development Committee hearings – April 19 – April 27
    - Remote voting starts May 14
    - Public Comments due – July 17
    - Final Action Hearings – Sept 30 – Oct 7
    - Remote voting has been delayed due to polling device problems
  - 2016 – Group B – IFC and IRC
    - Code Development Committee hearings – April 17-27, 2016
    - Public Comments due – July 22, 2016
    - Remote voting – Nov 8 - 21, 2016
  - 2017 – Group C – No longer exists
FCIA Proposal for ICC Group B

• F 115 – Addresses inspection, testing, and maintenance of firestop systems and joint systems
  • Key requirement is to have drawings of fire and smoke rated construction
  • Also requires documentation when system repaired with a listed system
  • Committee Recommendation – Disapproval
    • Drawings will be costly to prepare
    • Documentation not available
  • Multiple Public Comments submitted on F 113 from FCAC
    • Final Action on F 113 – Approval As Modified by Public Comments
FCIA Proposal for ICC Group B

• Annual inspections of through penetration firestop systems in ALL buildings
  • Owner required be maintain an inventory
  • Where the system design number is known – inspect to listing criteria and manufacturers instructions.
FCIA Proposal for ICC Group B
Other Proposals of Interest

• F113 – Proposed by FCAC and is mostly editorial revision of F701 that addresses inspection of existing fire protection features
  • Committee Recommendation – Disapproval
  • This provides additional time for FCIA to work with FCAC for a combined submission
  • Approval as Modified by Public Comments
• F114 – Proposed by IFC and addresses replacement and repair to meet requirements at time of construction
  • Committee Recommendation - Disapproval
• Some other changes in IFC and IRC which could impact industry
  • Committee Recommendations generally result in no impact
ICC Code Development Cycle Summary

- No reductions in requirements for compartmentation
- No increases in requirements for compartmentation
- The firestop industry needs an installation standard
- Unresolved issues:
  - Joints
  - Communicating stud spaces
    - By a horizontal distance of not less than 24 inches (610 mm) where the wall or partition is constructed with individual noncommunicating stud cavities...
- Long term (next cycle)
  - Editorial revision of the penetration and joint sections
NFPA 1/101/5000 Cycle

• Critical Dates
  • NFPA 1/101/5000
    • May 16, 2016 – Deadline to submit Public Comments
    • NFPA 101/5000 Committee meetings in June and July
    • NFPA 1 Committee meeting in October
NFPA 1/101/5000 Cycle

• First Draft Revisions
  • Maintenance and inspections of passive fire protection features
    • Submitted to NFPA 1 – Approval for inspections every three years
    • No Public Comments
  • Marking of fire/smoke barriers
  • Joint system required at head of wall with non-rated floors/roofs
  • L rating required for penetrations of smoke barriers in new construction
    • Some of these barely passed ballot
• Other First Drafts
  • 40,000 sq. ft. smoke compartment for health care occupancies approved essentially the same as the IBC change.
What Are Your Code Compliance Issues?
Questions?

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