



# TechNotes

Editor - Roland Asp, CET

#506

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This edition of TechNotes was written by Vince Powers, NFSA's ITM Specialist.

## Sprinkler Inspection and Testing in Healthcare Facilities

If you are involved in the Inspection, Testing and Maintenance (ITM) of water-based fire protection systems then you are most likely familiar with The Joint Commission and Centers for Medicare and Medicaid Services (CMS). There seems to be some heartache in the fire sprinkler industry when it comes to conducting routine ITM services in an accredited healthcare facility, hopefully this article will shed some light on what is required and who is the Authority Having Jurisdiction (AHJ) when it comes to these facilities.

### What and who is CMS?

The CMS is part of the Department of Health and Human Services that oversee the administration of Medicare, Medicaid, and Children's Health Insurance programs. CMS provides status to national health care accrediting organizations to deem which healthcare facilities meet or exceed the requirements set forth in accreditation in a specific area, in this case fire and life safety, more specifically water-based fire protection systems.

On the website <https://healthcare-lifesafety.com/accreditation-inspection-agencies/> there are seven accrediting agencies that are approved by CMS with The Joint Commission being one of the most widely known in the fire sprinkler industry. The CMS has adopted the 2012 edition of NFPA 101, *Life Safety Code* which in Section 9.7.5 requires all ITM sprinkler systems (as well as other water-based systems) to be maintained in accordance with NFPA 25, *The Standard for Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems*, 2011 edition. The Joint Commission is an organization that provides a service to the CMS by evaluating health care facilities performance and providing feedback to CMS. CMS uses this information to approve funding for healthcare facilities. This is of course the abbreviated version of what CMS and The Joint Commission do.



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### Who is the AHJ?

Sometimes it can be confusing to determine who is the enforcer of NFPA 25 or any other NFPA standards when it comes to healthcare, essentially, who is the AHJ?

- Authority Having Jurisdiction: An organization, office, or individual responsible for enforcing the requirements of a code or standard, or for approving equipment material, an installation, or a procedure.

This definition is defined the same across all NFPA codes and standards and means that anyone that has the responsibility of ensuring, in this case, that all ITM requirements associated with that building's fire sprinkler systems are completed. Typically, the enforcement is completed by the local fire marshal or fire inspector, but this could also include but not limited to the insurance carrier, The Joint Commission, and possibly the building owner. In many cases the local AHJ will use the reports gathered by The Joint Commission inspection to satisfy the local needs and requirements as The Joint Commission usually has the means to ensure that all necessary work has been completed. They also will make recommendations on repairs, upgrades, and maintenance of these systems to CMS.



## How does the requirements of Joint Commission ITM differ from NFPA 25?

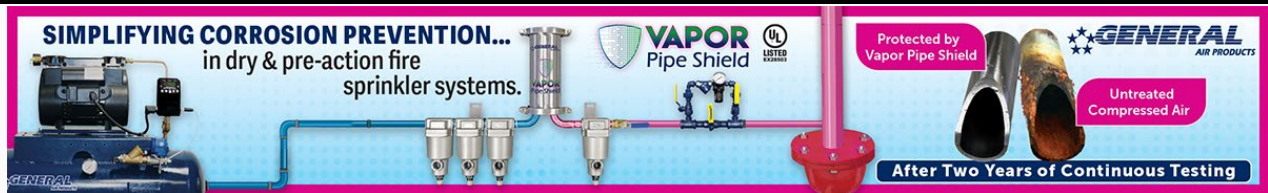
There are no differences. As stated before, CMS adopted the 2012 *Life Safety Code* (NFPA 101) and was effective July 5, 2016. Additional information can be found at <https://www.cms.gov/Regulations-and-Guidance/Legislation/CFCsAndCoPs/LSC>

The requirements typically are the same for The Joint Commission as found in NFPA 25 ITM requirements. Most of the differences are how the reports are requested to be presented and maintained. Technically, the only information required, according to The Joint Commission, on a fire protection report is the following:

- Name of the activity
- Date of the activity
- Inventory of devices, equipment, or other items
- Required frequency of the activity
- Name and contact information, including affiliation, of the person who performed the activity
- NFPA standard(s) referenced for the activity (including the edition and section)

- Results of the activity

However, most of the time it is requested that the report be prepared and separated into a binder with all systems, main drain tests, and devices divided by type. For example, all wet systems would be in a section, all dry systems would be another section, then each device, such as tamper switches, would be in their own section.



## EOD and Joint Commission

In the end, requirements for ITM in compliance with The Joint Commission is no different than the requirements of NFPA, in fact they specifically reference NFPA standards in all of their ITM rules.

One of the most used benefits for members of The National Fire Sprinkler Association is the Expert of the Day (EOD) program. This program is used to provide informal interpretations to questions asked about the who, what, when, and why for fire sprinkler systems. For example, recently a question was submitted to EOD in reference to forward flow testing of backflow devices. The NFSA member was completing a forward flow test on a pipe schedule system in a healthcare facility and The Joint Commission representative required the member to flow the system at a minimum of 500 gallons per minute. The member sent in an EOD question to verify if this was required. The answer is yes, NFPA 25 requires the system to be flowed at a minimum of system demand. Since this was a pipe schedule system, there was no hydraulic design information plate with this information. Instead, the information can be found in NFPA 13, 2010 edition, Table 11.2.2.1. This table provides the system demand for light and ordinary hazards for pipe schedule systems.

The reason for telling this story is to show that The Joint Commission does not typically just pull requirements out of the air or make them up. Their requirements are based on generally accepted practices and can be found in several NFPA standards.



## Additional Information for reporting.

<https://www.jointcommission.org/standards/standard-faqs/home-care/environment-of-care-ec/000001243/>

The Joint Commission separates disciplines by environment of care codes, below is a link to the physical environment with information to each discipline such as fire sprinkler, fire alarm, dampers, etc.

<https://www.jointcommission.org/resources/the-physical-environment/>

Below is a link to a presentation by The Joint Commission regarding ITM of several fire protection systems.

[https://www.jointcommission.org/-/media/tjc/documents/resources/patient-safety-topics/physical-environment/features\\_of\\_fire\\_protection\\_related\\_to\\_fire\\_alarm\\_systempdf.pdf?db=web&hash=26FB29579B75C6576D60A5E05B157AB6&hash=26FB29579B75C6576D60A5E05B157AB6](https://www.jointcommission.org/-/media/tjc/documents/resources/patient-safety-topics/physical-environment/features_of_fire_protection_related_to_fire_alarm_systempdf.pdf?db=web&hash=26FB29579B75C6576D60A5E05B157AB6&hash=26FB29579B75C6576D60A5E05B157AB6)

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NFSA's Fire Sprinkler Layout Design Training includes a hard copy of recently updated and revised "Layout Book" as well as a copy of the 2022 edition of the NFPA 13 standard. The Layout Book has been divided into 43 chapters and an annex with each of the chapters grouped into parts that have a basic theme in the layout, detail, and calculation of a fire sprinkler system. There are four parts of the book roughly corresponding to the order in which decisions are made in the process of getting a sprinkler system into a building.

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## All 2023 Tech Tuesdays are NOW available for registration!

Our next Tech Tuesday will be March 21st, 2023 at 12:30 - 1:30 PM eastern time. The topic will be ITM of Sprinklers in Healthcare

This class will provide attendees with the criteria for coordinating fire alarm and sprinkler inspection testing and maintenance (ITM) in health care facilities. Topics to be discussed will include ITM requirements and how healthcare may differ from NFPA 25, frequencies and reporting.

[Register for the next Tech Tuesday Here](#)

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### National Fire Sprinkler Association

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