



## CORROSION:

### A Big Problem for Fire Sprinkler Lines

By Ron Brook, Life Safety Code Surveyor

NFPA 101, the Life Safety Code, recognizes sprinklers in numerous ways, particularly to offset deficiencies in existing buildings. For example, longer travel distances to exits, and interior finish of a higher combustibility than would otherwise be permitted, are allowed where sprinklers exist. Automatic sprinklers, properly maintained, provide a highly effective safeguard against the loss of life and property from fire. Rarely do fully automatic sprinkler systems fail to control fires. Failures are seldom due to the sprinklers themselves, but rather to inadequate water supply caused from clogged lines.<sup>1</sup> Failure of a fire sprinkler line always threatens the loss of human life.

Corrosion related to failures at sprinkler lines have greatly increased over the past decade raising not only operating and repair costs, but the threat to inhabitants as well. Many different factors can lead to a corrosion problem at a fire sprinkler line. Corrosion is often totally concealed from view, and may remain unrecognized for years. No external signs or indicators normally exist to suggest a corrosion problem prior to a leak occurring – at which time the major damage, often irreversible, has already taken place. In most cases, the concern raised due to a leak at a fire sprinkler pipe is more directed to the potential for water damage or the cost of replacement, rather than whether the pipe will provide the necessary water flow during a fire emergency. And yet corrosion, by far, presents the greater threat. Years of corrosion activity can easily produce hundreds of pounds of debris capable of being dislodged by a fire pump kicking in, and then forced downstream to the sprinkler heads. At that point, all the firefighting equipment, command and controls, planning and inspection become worthless if water cannot be supplied to the source of the fire.

With so many forces acting against fire sprinkler systems, corrosion monitoring becomes the only means to ensure water will be available when a fire emergency exists. NFPA 25, 1999 Edition, Section 10-2.2 which addresses obstruction prevention states: Systems shall be examined internally for obstructions where conditions exist that could cause obstructed piping. If the corrosion has not been corrected or the condition is one that could result in obstruction of piping despite any previous flushing procedures that have been performed, the system shall be examined internally for obstructions every 5 years.

This investigation shall be accomplished by viewing the interior of a dry valve or preaction valve and by removing two cross main flushing connections.

As a reminder, the Centers for Medicare & Medicaid Services (CMS) is requiring all long term care facilities (nursing homes) to be fully sprinklered with an approved fire sprinkler system by August 13, 2013. Please see Survey & Certification Letter S&C 09-04, or call the Certification Bureau at 406-444-2099.

<sup>1</sup> Federal Emergency Management Agency United States Fire Administration (1987). Schomberg plaza fire New York City (Harlem). (Contract no EMW-86-C-2277). Schaenman, P.

## FACILITY/PROVIDER NAME CHANGES

By Carla Black, Administrative Assistant

Before the Certification Bureau can change your Legal Business Name or Doing Business Name, we must receive notification of approval from either the appropriate fiscal intermediary or carrier. You will need to complete Form CMS-855A or CMS-855B, updating the appropriate sections as required, and submit it to your fiscal intermediary or carrier for review and approval. Once approved by the fiscal intermediary or carrier, they will send a copy of the Form CMS-855A or CMS-855B with the updated/changed information to our office.

- Form CMS-855A is required for these provider types: Critical Access Hospital, End-Stage Renal Disease Facility, Home Health Agency, Hospice, Hospital, Rural Health Clinic and Skilled Nursing Facility.
- Form CMS-855B is to be completed by Ambulatory Surgical Centers.

Form CMS-855A and CMS-855B can be accessed through the CMS website at [http://www.cms.gov/MedicareProviderSupEnroll/02\\_EnrollmentApplications.asp](http://www.cms.gov/MedicareProviderSupEnroll/02_EnrollmentApplications.asp)

## FOOD SAFETY TRAINING

During the surveyors' January training session, they (and their supervisors) attended ServSafe training on the USDA Food Code. As you may know, F371, Sanitary Conditions related to storing, preparing, distributing and serving food, is one of the most frequently cited deficiencies in long term care. Everyone learned quite a bit about food safety and kitchen sanitation. Feel free to ask the surveyors about the training. They'll be happy to share information with you and direct you to any resources that might help you understand the Food Code or how to improve your food delivery systems.

## MDS TRAINING

Did you know...?

- The Bureau provides monthly training on MDS from the comfort of your office computer (or telephone)
- The training focuses on a different part of the manual every month, and plenty of time is reserved for questions
- The training is provided by WebEx and can be accessed from any computer
- When you use the computer connection (as opposed to the phone connection) you can also view actual information as they are being discussed
- When you use the computer, you can submit questions in writing at any time without interrupting the speaker
- During the course of one year, the entire manual is discussed
- Recordings are available if you cannot attend
- For questions, call the Certification Bureau at 406-444-2099
- It is free and easy to attend these trainings

## FREE TOOL KIT OFFERED FROM DEMENTIA PRACTITIONERS

The National Council of Certified Dementia Practitioners Alzheimer's and Dementia Staff Education Week Tool Kit is available free of charge. The Tool Kit is available at [www.nccdp.org](http://www.nccdp.org) and it includes many free 30 minute Power Point in-services for download.

## HELPFUL CMS DOCUMENTS

The Center for Medicare and Medicaid Services (CMS) provides survey and certification letters or S&Cs as guidance to state surveyor agencies and certified facilities. These S&C letters are numbered based on the year and order in which they were produced. The S&Cs can be found at:

<http://www.cms.gov/SurveyCertificationGenInfo/PMSR/list.asp>.

This CMS website allows a search based on the number of the S&C or a subject matter. As a suggestion, if you use subject matter as search criteria, you should attempt different searches in singular and plural because the search results may return different information. As examples, here are some recent S&Cs:

- Ambulatory Surgical Center (ASC) Waiting Area Separation Requirements - S&C 10-20-ASC
- Advance Copy: Revisions to Appendix PP, State OpeGuidance to Surveyors for Long Term Care Facilities - S&C 10-33-NH
- Revised Hospital Anesthesia Services Interpretive Guidelines
- Questions Related to State Agency (SA) Records Management Policy for Paper and Electronic Formats – S&C 10-22-ALL
- End Stage Renal Disease (ESRD) Program Keeping Informed about Survey – S&C 10-30-ESRD
- Impact of Nursing Shortage on Hospice Care – S&C 10-31-Hospice
- Critical Access Hospital (CAH) Regulatory Changes – S&C 10-10-CAH
- Updated Interim Guidance Regarding the Temporary Mid-Level Staffing Waiver for RHCs – S&C 09-27
- Use of the Name of the Laboratory Director and EIN listed in the CLIA Data System – S&C 10-11-CLIA

## NURSE AIDE TRAINING

By Cynthia Galaska, RN, MSN

Program Coordinators and Clinical instructors please note that two minor changes were made on the Montana Department of Public Health and Human Services Nurse Aide Skills Competency Checklist.

The first revision was the requirement for nurse aide candidates to participate in a fire drill. Previously, candidates were required to demonstrate participation in a fire drill. Successful completion of this task now includes the ability for candidates to pass the skill by examination.

The second revision concerns the instruction of the use of restraints. The Bureau staff regularly receives comments regarding the requirement for trainers to teach the use of restraints. Often the comments are pointed toward the current culture of restraint free care environments and why restraint use is a required skill. The survey teams regularly observe positioning devices and assistive devices that have traditionally not been viewed as a restraint, but often warrant an assessment to determine if in fact they may be a restraint. To this end, restraint use remains on the skills checklist to facilitate dialogue with nurse aide candidates about the use of Geri chairs, TAB alarms, Lap buddies, wedges, etc. The intent is to heighten the nurse aide candidate's awareness of how such a device may be a restraint. A few examples of the restraints for consideration were added to the skills checklist. The candidate may successfully complete this task knowledge by examination or demonstration.

The revised checklist is available on the Department's web site: <http://www.dphhs.mt.gov/cna/> Please direct your nurse aide training questions to the following email address: [cna@mt.gov](mailto:cna@mt.gov). The email account is checked and filtered daily to address your needs in a timely manner.

## LTC FACILITY SURVEY PREPARATION

Surveyors always request documentation during surveys. The DPHHS Certification Bureau created a list of those items that will be needed. A list of resident names with room numbers is needed immediately; please provide one for each surveyor. The remaining items will be needed within an hour: a completed Roster Matrix; a copy of the facility's layout, indicating the location of nurses' stations, individual resident rooms, and common areas; a work schedule for RNs, LPNs, and CNAs for the week prior to survey, and for the survey week; a list of key facility personnel, their titles and locations; lists of names and locations of Quality Assurance Committee members; and a copy of the written information that is provided to residents regarding their rights, etc. A complete list can be seen at <http://www.dphhs.mt.gov/gad/certndex.shtml> under the Survey and PoC Process heading. Recognizing that surveys are unannounced, some of this information cannot be gathered until the surveyors arrive; however, some can be prepared in advance, and this will save time when the surveyors arrive. The Certification Bureau suggests assembling as much of this information as you can prior to the survey.