

Submitter : Mr. David Uhaze
Organization : State of New Jersey, Dept. of Community Affairs
Category : State Government

Date: 11/01/2006

Issue Areas/Comments

Phase-in

Phase-in

The State of New Jersey Department of Community Affairs has already submitted a proposal to the State legislature which would require sprinklering of existing nursing homes throughout the state as any extended delay for this would be a disservice to LTC residents. That proposal has a 3 year phase-in period. A similar bill was enacted 3 years ago to require sprinklers in dormitories and was implemented with great success.

Submitter : Mr. W Rudolph

Date: 11/07/2006

Organization : Wisconsin Healthcare Engineers Association

Category : Health Care Provider/Association

Issue Areas/Comments

GAO Report

GAO Report

The CMS has already adopted the 2000 edition of the NFPA 101 Life Safety Code. This document in chapter two mandates both the NFPA 13 and the NFPA 25 documents CMS is proposing to adopt again. These statements are redundant and are not required.

The only action that needs to be developed is when does a fire sprinkler system need to be installed in existing facilities. By duplicating the reference this could create future problems if another edition of the Life Safety Code is adopted which would reference different editions of the NFPA 13 and 25 documents.

GENERAL

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As the chair of the WHEA Codes & Standards Committee, I represent over 400 professionals in Wisconsin healthcare. Thank you for the opportunity to provide input

Regulatory Impact Statement

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The CMS has already adopted the 2000 edition of the NFPA 101 Life Safety Code. This document in chapter two mandates the NFPA 25 documents CMS is proposing to adopt again. This statement is redundant and are not required.

In the section III titled Collection of Information Requirements, the fourth paragraph discussing that outside contractors would most likely be used is a matter of concern. The NFPA 25 addresses who is able to perform the maintenance and testing. There should be no additional requirement that all work be completed by outside contractors as many long term care facilities have competent, trained staff who can and should perform these functions. In Wisconsin we have experienced several cases where the in house staff found issues that the contracted vendors did not due to inadequate testing.

