

Submitter : Mr. Randall Lewis

Date: 11/17/2006

Organization : n/a

Category : Individual

Issue Areas/Comments

Background

Background

My personal background: I am a facility architect and have over twenty years of experience in design and construction.

Current Fire Safety Status

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Please note that existing nursing facilities are already required to comply with building code provisions. Lives and injuries are certainly reduced significantly by the installation of sprinkler systems. However, other building code provisions such as fire walls and penetrations also increase the likelihood of survival during fires - these elements are already required by present building codes. Fire walls and penetration protection already greatly allow survival by limiting the spread of fire during evacuation of residents from danger areas.

GAO Report

GAO Report

There should be no further action in implementing of this proposed provision.

GENERAL

GENERAL

There is no doubt that retrofitting existing buildings with the latest provisions of a building or life safety code would reduce fatalities and injuries. However, even current building codes do not currently require retrofitting of sprinkler systems to buildings unless a major renovation is undertaken for such facilities. Requiring retrofitting of sprinkler systems for nursing homes would be very expensive and the cost of such would just be passed on to those responsible for paying for the resident care. This would also set a strong precedent for other building types to be retrofitted as well, increasing the costs of retrofitting them. There is also no doubt that this proposed requirement would directly benefit contractors who install such sprinkler systems and could be seen only as a special interest since the first installation costs would certainly only benefit such contractors.

Installation

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Sunset provision is recommended to not be applicable since the recommendation is to not implement this provision.

Phase-in

Phase-in

Phase-in should be not applicable as I am against retrofitting of existing nursing facilities.

Regulatory Impact Statement

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The installation of any sprinkler system requires regular specialized maintenance. A nursing home that has a sprinkler system installed would then have increased maintenance expenses which would also be passed on to those responsible for paying of resident care. Also, sprinkler system retrofit may have to be arranged within areas of buildings that have no freeze protection which would also increase the cost of installation due to having to add such protection.

Submitter : Eric Coffelt
Organization : Local 528 Cement Masons
Category : Other Association

Date: 11/21/2006

Issue Areas/Comments

GENERAL

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It seems good practice to minimize the exposure of patients (who come for medical attention) to a fire and thus burns.