Compliance Documentation 101

Codes and Regulatory Compliance Track

Making healthcare remarkable

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Course Learning Objectives

1. Introduce **code and other requirements** for documentation procedures related to inspection, testing, and maintenance
2. Recall how to **navigate** through the **proper file storage system** and locate specific forms and documents
3. Recognize **standard Novant Health documents** for code compliance and their respective application
4. Identify appropriate forms and related documentation given **various scenarios**

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learning objective 1: code-required documentation for Inspection, Testing, and Maintenance (ITM) activities

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Multiple codes specify equipment ITM requirements.

Documentation is required to prove equipment is inspected, tested, and maintained according to code specifications.

RWD

abbreviation used by The Joint Commission for "required written documentation"

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Some codes are more relevant to Facilities Management than others.

NFPA 10: Portable Fire Extinguishers

NFPA 13: Installation of Sprinkler Systems

NFPA 25: Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems

NFPA 70: National Electrical Code®

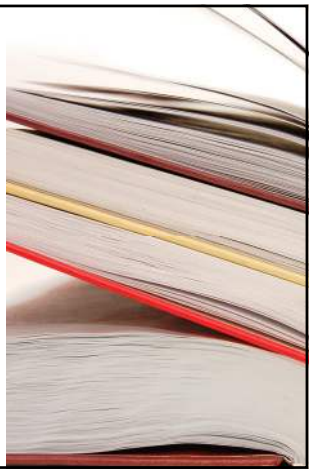
NFPA 72: National Fire Alarm and Signaling Code®

NFPA 80: Fire Doors and Other Opening Protectives

NFPA 99: Health Care Facilities Code

NFPA 101: Life Safety Code®

NFPA 110: Emergency and Standby Power Systems



5

Documentation is only required when essential.

Look for the documentation icon: or D located throughout the standards to identify data collection and documentation requirements

The word, "written," appears in the text if an EP requires written documentation, paper or electronic format.

What are some examples of documents or documentation that are required for regulatory compliance?

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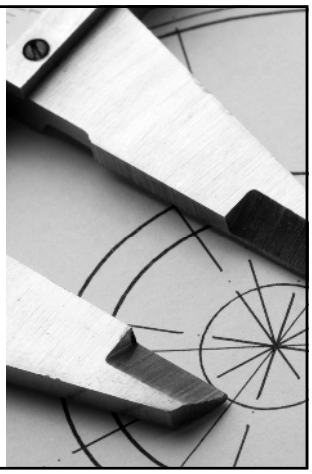
Elements of Performance (EPs)

statements that detail **specific performance expectations** that must be in place to provide high-quality care

Each element of performance is related to a **singular** focused item.

EPs are scored and determine an organization's overall **compliance with a standard**.



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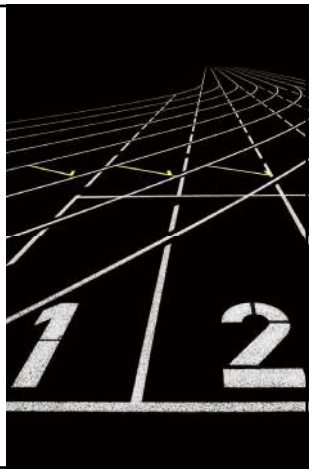
EPs are numbered sequentially under each standard.

Examples: EP1, EP2, EP3, etc.

Some EPs established by accrediting organizations (AOs) **may not apply to hospitals** and are skipped within the applicable healthcare standards.

If a standard lists EP1, EP2, and EP5, this indicates that EP3 and EP4 **do not apply** to the Hospital Accreditation Program.



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Environment of Care (EC) Standards

The **EC chapter in TJC Standards** promotes a safe, functional, and supportive healing environment.

The Environment of Care includes:

- physical building or space
- equipment used to support patient care or to safely operate the building or space
- building or space occupants (people)

The EC chapter emphasizes the importance of **managing risks** within the environment of care, which are **different** from risks associated with patient care, treatment, and services.

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Risk Mitigation Planning

EC.01.01.01: *planned activities to minimize risk within the Environment of Care*

Documentation memorializes the assessment process necessary to **identify and mitigate** risks.

TJC identifies these potential risks within the Environment of Care:

- safety and security for people, equipment, and other material
- handling of hazardous materials and waste
- potential for fire
- use of medical equipment
- utility systems

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NFPA 99 (2012) defines risk categories based on how a system or equipment failure would affect patient care.

***NFPA 99* defines Category 1, 2, 3, and 4 systems and equipment.**

Novant Health's CMMS inventory indicates which assets are high risk, consistent with *NFPA 99* Category 1 systems.

1. Failure is likely to cause **major injury** or **death** to patients or caregivers.
2. Failure is likely to cause **minor injury** to patients or caregivers.
3. Failure is not likely to cause injury but rather **discomfort** to patients or caregivers.
4. Failure would have **no impact** to patient care.

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Fire Drills

EC.02.03.03: *mandatory fire drills*

Hospitals must conduct fire drills **once per shift per quarter** in each health care occupancy building as defined in the *Life Safety Code®* (*NFPA 101*)

EP1 Notes

- patient evacuation not required
- alternate communication method allowed (other than audible alarms) for drills conducted between 9 pm and 6 am
- for leased properties, drills are only conducted in the areas occupied by the hospital

Fire drills are administered by Novant Health Engineering with Public Safety.

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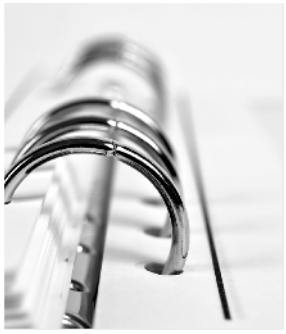
Fire Protection Systems

EC.02.03.05: *maintenance, testing, and inspection of fire protection systems*

TJC requires a **working inventory of fire safety devices** because if a device fails or is not tested, then it can be located.

Documentation Requirements (EP28)

- name of the activity
- date of the activity
- 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
- results of the activity



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Fire Protection Systems

EC.02.03.05: ***maintenance, testing, and inspection of fire protection systems***

Applicable Equipment and Devices

- fire pumps
- standpipes
- sprinkler water storage tanks
- mechanical water-flow switches including water motor gongs
- valve tamper switches
- vane water flow switches
- detectors and door releasing devices
- CO2 other gaseous automatic systems
- ventilation shutdown devices
- smoke and fire dampers
- portable fire extinguishers
- kitchen automatic extinguishment
- portable fire extinguishers
- kitchen automatic extinguishment
- supervisory signal devices
- fire alarm notification devices
- fire department connections
- fire hoses
- rolling fire doors

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Fire Protection Systems

EC.02.03.05: *maintenance, testing, and inspection of fire protection systems*

Novant Health technicians are responsible for the following:

- weekly fire pump run tests; water flow not required (EP6)
- monthly fire extinguisher inspections (EP15)

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Utility Systems

EC.02.05.05: *maintenance, testing, and inspection of utility systems*

Document the test date and test results for utility system components on the inventory **prior to initial use and after every major repair or upgrade** (EP2)

Document completion date and testing, inspection, and maintenance results for the following:

- high-risk components (EP4)
- infection control components (EP5)
- non-high-risk components (EP6)

RWDs apply to **all components** listed on the hospital's utility system inventory.

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Utility Systems

EC.02.05.05: *maintenance, testing, and inspection of utility systems*

Line isolation monitors (LIMs) (EP7)
required in North Carolina

Monthly testing by actuating the LIM test switch per NFPA 99, engaging visual and audible alarms

Annual manual testing for automated self-testing LIM circuits

Each time after a repair or renovation is performed on the electrical distribution system

RWD includes: date, room or area tested, and test results

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Emergency Power

EC.02.05.07: *maintenance, testing, and inspection of emergency power systems*

Must be Inspected Weekly:

- emergency power supply system (EPSS) including batteries and associated components (EP4)
- sealed and maintenance-free generator batteries
- sealed batteries: mfr. ensures enough acid is in the battery to sustain the chemical reaction under normal use

Monthly: conductance testing to verify the battery's ability to conduct current

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Emergency Power

EC.02.05.07: *maintenance, testing, and inspection of emergency power systems*

Must be Tested Monthly:

- functional test of **battery-operated** task and emergency exit lighting for 30 sec. (EP1)
- visual inspection of all exit signs not required for egress (EP1)
- emergency generators with a cold start under load for 30 min. (EP5)
- diesel-powered emergency generators with a dynamic load that is at least 30% of the nameplate rating (EP6)
- automatic and manual transfer switches on the inventory (EP7)

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Emergency Power

EC.02.05.07: *maintenance, testing, and inspection of emergency power systems*

Must be Tested Every 12 Months:

- functional test for 1.5 hrs. of battery-powered lights on the inventory required for egress and exit signs (EP2)
- functional test for 30 min. of battery-powered lights where deep sedation and general anesthesia are administered (EP2)
- fuel quality to ASTM standards (EP8)

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Emergency Power

EC.02.05.07: *maintenance, testing, and inspection of emergency power systems*

Testing Required Every 12 Months for Emergency Generators (EP6)**:**

- required when a generator fails monthly testing
- test with supplemental loads (dynamic or static) of 50% of nameplate rating for 30 min.
- 50% load testing followed by 75% of nameplate rating for 60 min.
- total **continuous** testing duration equals 1.5 hrs.

Note: Non-diesel-powered generators are tested with available load only.

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Emergency Power

EC.02.05.07: *maintenance, testing, and inspection of emergency power systems*

Must be Tested Every 36 Months:

- performed **annually** by third party contractor at Novant Health facilities
- emergency power test all emergency generators for 4 continuous hrs. (EP9)
- Contractors perform generator load bank testing at the same time as 4-hr. testing.
- diesel-powered emergency generators with a dynamic or static load at least 30% of the nameplate rating (EP10)

Note: Non-diesel-powered generators are tested with available load only.

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Medical Gas and Vacuum Systems

EC.02.05.09: *maintenance, testing, and inspection of medical gas and vacuum systems*

TJC requires a **working inventory** of critical components because if a component fails or is not tested, then it can be located.

Inventory Systems

- piped medical gas and vacuum systems
- waste anesthetic gas disposal (WAGD)
- support gas systems

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Medical Gas and Vacuum Systems

EC.02.05.09: *maintenance, testing, and inspection of medical gas and vacuum systems*

TJC requires a **working inventory of critical components** because if a component fails or is not tested, then it can be located.

Critical Components

- all source subsystems
- control valves
- alarms
- manufactured assemblies containing patient gases
- inlets and outlets

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Medical Gas and Vacuum Systems

EC.02.05.09: *maintenance, testing, and inspection of medical gas and vacuum systems*

Testing **frequency** is per the hospital's policy. Document dates and results.

Piped medical gas and vacuum systems are tested for:

- purity
- correct gas
- proper pressure

Testing occurs when these systems are:

- installed
- modified
- repaired

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Life Safety (LS) Standards

The LS chapter addresses several topics contained in the Life Safety Code:

- general life safety design and building construction
- **means of egress, including design of space, travel distances, illumination, and signage**
- protection provided by vertical openings, corridors, smoke barriers, and interior finishes
- fire alarm notifications, including audible and coded alarms
- suppression of fires, including fire sprinkler systems
- building services, including elevators and chutes
- decorations, furnishings, and portable heaters

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Physical Environment

LS.01.01.01: *design and manage the physical environment to comply with The Life Safety Code*

Dedicated staff oversees LS documentation to ensure LS.01.01.01 compliance.

LS Documentation Requirements

- in timeframes determined by the hospital, perform building assessment to determine LS chapter compliance (EP2)
- maintain current and accurate drawings denoting features of fire safety and related square footage (EP3)
- any inspections and approvals made by state or local fire control agencies (EP5)
- current basic building information in the Statement of Conditions (EP7)

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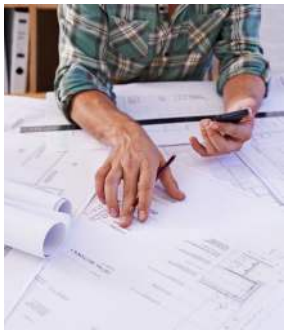
Physical Environment

LS.01.01.01: *design and manage the physical environment to comply with The Life Safety Code*



Required Fire Safety Features on LS Drawings (EP3)

- building areas that are fully sprinklered (if partially sprinklered building)
- locations of all hazardous storage areas
- locations of all fire-rated barriers
- locations of all smoke-rated barriers
- sleeping and non-sleeping suite boundaries and size
- location of designated smoke compartments
- locations of chutes and shafts
- any approved equivalencies or waivers

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Interim Life Safety Measures

LS.01.02.01: *protect occupants during times when the Life Safety Code is not met or during construction*

Novant Health's ILSM policy addresses when and to what extent to implement EP2 through EP15.

ILSM Documentation Requirements

- written ILSM policy for when life safety deficiencies cannot be immediately corrected or during construction (EP1)
- notification to fire department or other emergency response group and fire watch, including times (EP2)
- monthly inspection and testing of temporary systems, including dates (EP12)

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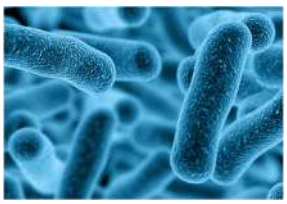
Some EPs in the Emergency Management and Infection Control Standards include required written documentation.

EM Standards aim to minimize the adverse impacts from emergencies to patient care, treatment, and services.

IC Standards focus on maintaining an effective program that covers a wide range of infection-related situations.



These documentation requirements are **not cited in codes but are necessary for regulatory compliance with CMS** and its accrediting organizations (AOs).

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Utilities Management Plan

EM.02.02.09: *included in the EOP is how the hospital will manage utilities during emergencies*

Hospitals should **not rely on a single source** supplier and, where possible, establish a **backup source outside of the local community**.

Establish alternate means for providing essential utilities:

- alternative equipment at the hospitals
- negotiated relationships with primary suppliers
- provisions through a parent entity
- MOU with other organizations in the community

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learning objective 2:
locate Novant Health compliance-related documents

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TheHubWorx

computerized maintenance and compliance management system

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Novant Health is now using TheWorxHub for its system-wide preventative maintenance storage system.

TheWorxHub is a Dude Solutions software solution designed specifically for healthcare facilities to manage maintenance and compliance tasks.

Log into TheWorxHub using **individual** username and password.

Use TheWorxHub to:

- create, assign, and manage work orders
- maintain asset inventories
- maintain compliance documentation records
- view performance dashboards

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TheWorxHub helps PES staff focus on the Environment of Care, compliance, efficiency, and reporting.

Key Features

- cloud-based and mobile device capable
- automated scheduling for maintenance and compliance tasks
- compliance-related tools
- communication across departments
- data reporting and analysis
- standardized processes

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TheWorxHub Dos and Don'ts

Common Mistakes

- leaving the form or any form fields blank
- using vague phrases like, "work order completed"
- missing asset information (if available)

Guidelines

- Stick to code-required testing and inspection schedule (e.g., 0 missed monthly inspections are permissible within a single year).
- Provide asset information, if available.
- Notify supervisor and other appropriate staff in the event of a life safety deficiency.

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ATG

compliance management platform for storing template forms, permits, and other documents

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Compliance-related documents and life safety drawings can be located on ATG.

ATG is a compliance documentation storage system for template forms and permits, life safety drawings, and other resources.

Example Resources

- interim life safety measures assessment forms and implementation appendices
- pre-construction risk assessment form
- infection control risk assessment form*
- above ceiling work permit
- lockout/tagout permit
- environmental rounding tool

**The ICRA process is now a manual procedure as stipulated by Infection Prevention.*

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Document Manager

file storage for Novant Health policies

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Document Manager houses all current Novant Health policies.

Some of these policies were created to support regulatory compliance including:

- Above Ceiling Work Permit
- Active Shooter Alert
- Asbestos Management
- Chemical Hazard Communication Program (Employee Right-to-understand)
- Fire Drills
- Hazardous Chemical Spill Response
- HVAC Personal Protective Equipment
- Infectious or Regulated Medical Waste
- Infection Control Risk Assessment
- Interim Life Safety Measures
- Mold Remediation
- Pre-Construction Risk Assessment
- Universal and Other Regulated Wastes

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SharePoint

Novant Health standard forms used for compliance-related equipment inspection, testing, and maintenance activities

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Standard Novant Health equipment inspection, testing, and maintenance forms are located on SharePoint.

SharePoint is the Plant Engineering Services website that contains **template** inspection checklists, equipment testing and log forms, and other information.

Example Resources

- fire drill matrix
- door inspection checklist
- fire pump testing
- generator run log
- educational resources

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learning objective 3:
Novant Health ITM forms

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Novant Health Fire Drill Matrix
facility template schedule


COMPLETED 2021 FIRE DRILL MATRIX

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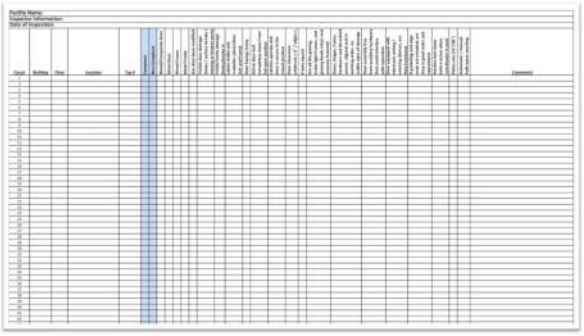
Novant Health Door Checklist
door inspection form



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Novant Health Door Checklist
door findings documentation report

Fire / Smoke Door Assembly Inspection Report

Facility Name:
Inspector Information:
Date of Inspection:
Findings:

Count	Building	Floor	Location	Tag Number	Description of Non-Compliance	Workorder #	Repairs Made and Door retested: Yes	No	If no: Explanation
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
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Code Reference: NFPA 80, 2010 Edition and NFPA 101, 2012 Edition

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Novant Health Door Checklist
code specifications reference sheet

NFPA 80: 2010 Edition - Code Specifications

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Novant Health Fire Pump Testing
weekly no flow testing template

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NFPA 25 - 2011 Edition
Weekly Fire Pump Testing
No-Flow

Pump Location:		Date	Date	Date	Date	Date
Pump Service:						
8.2.2(1)	Heat is adequate, not less than 40°F (5°C) for pump room					
8.2.2(1)	Ventilating louvers are free to operate					
8.2.2(3)	Controller pilot light (power on) is illuminated					
8.2.2(3)	Transfer switch normal pilot light is illuminated					
8.2.2(3)	Isolation switch is closed (Standby emergency source)					
8.2.2(3)	Phase reversal pilot light if off or normal phase rotation pilot light is on					
8.3.2.2	Pump Start- MANUAL (on switch)					
8.3.2.2	Pump start- AUTOMATIC (pressure drop)					
8.3.2.2	Pump Stop- MANUAL (off switch)					
8.3.2.2	Pump Stop- AUTOMATIC (timed stop if set)					
8.3.2.3	Pump run for at least 10 minutes					
8.3.2.5	Valves open (Suction, Discharge, & By-pass)					
8.3.2.6	Time controller is on first step (reduced voltage or reduced current starting)					
8.3.2.8	Pump Start pressure					
8.3.2.8	Suction Pressure					
8.3.2.8	Discharge Pressure - Add distance to water level in feet (or meters) and divide by 2.31 to compute psi. This total must match churn pressure as shown on fire pump nameplate.					
8.3.2.8	Start Time					

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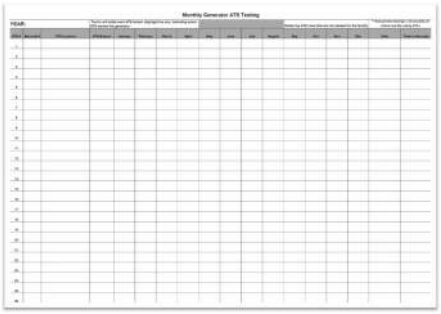
Novant Health Generator Run Log
monthly automatic transfer switch (ATS) log template



Alternate a different switch each month and document.

Switch sequence starting the generator is highlighted in yellow.

If any problems occur during ATS testing, document all issues and contact appropriate person immediately.

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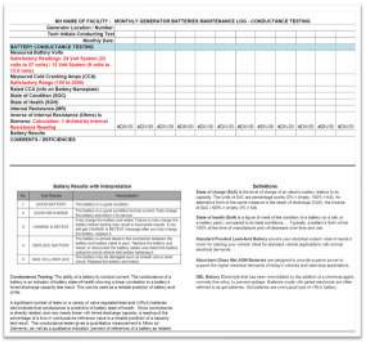
Novant Health Generator Run Log
monthly generator conductance template



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Novant Health Generator Run Log
weekly generator maintenance template

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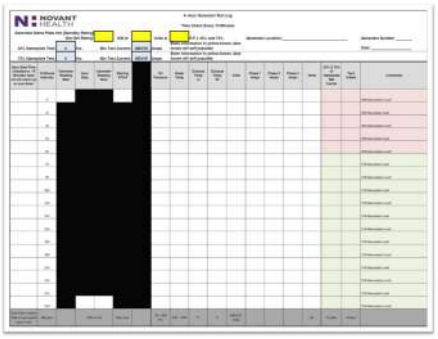
Novant Health Generator Run Log
monthly 4-hour generator log template



Test current is rated based on standby kW, rated voltage, and nameplate power factor (PF).

Some surveyors will request amps, and others will request kW.

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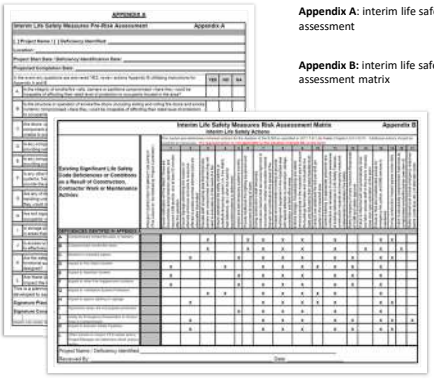
Novant Health ILSM Pre-Risk Assessment
Appendices A and B



Appendix A: interim life safety measure pre-risk assessment

Appendix B: interim life safety measures risk assessment matrix

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Novant Health ILSM Short Form
for non-construction activities

The **short form** is used when a life safety deficiency is identified during environmental rounding, survey, regular maintenance, etc. and the deficiency cannot be corrected within 24 hours.

Appendices C, D, E, and **F** are used when a full interim life safety plan is required for construction activities.

- Appendix C, Initiation of Interim Life Safety Measures
- Appendix D, Termination of Interim Life Safety Measures
- Appendix E, Interim Life Safety During Construction and Renovation Projects Checklist
- Appendix F, Fire Watch Procedures (to be documented with the standard Fire Watch Log)

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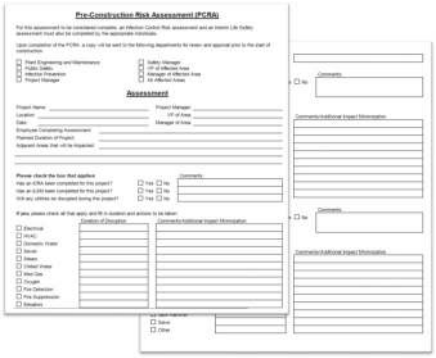
Novant Health PCRA Form
pre-construction risk assessment



A pre-construction risk assessment is performed to minimize operational disruptions during construction.

Use the identified risks to develop a plan designed to minimize disruption of patient care services and risk to staff and visitors.

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Novant Health ICRA Forms
infection control risk assessment plan and classification

The **infection control risk assessment plan** includes all related forms to complete before, during, and after the construction or renovation project.

The forms begin with **determining the ICRA classification**, which is completed by the Novant Health Project Manager and Infection Prevention staff.

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Novant Health ICRA Forms
construction permit and pre-occupancy checklist

The **ICRA construction permit** entitles a contractor to perform work on a project subject to satisfactory compliance to requirements stated for the 'Class' rating of that project.

The **pre-occupancy check sheet** is be completed by the Infection Preventionist prior to anyone occupying the area with Class III or IV permit.

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Contractor Above Ceiling Work Permit
policy NH-LS-5120 and 5120 form

Any contractor working on a Novant Health campus, above the ceiling, must **properly seal penetrations in fire and smoke partitions** and properly **support/secure wires/cables** in above ceiling spaces.

Penetrations are to be sealed with **approved fire caulk materials**. Other penetrations are to be sealed properly.

Novant Health Engineering shall approve the materials to be used for sealing all penetrations.

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Novant Health Lockout/Tagout Permit
template located within the ATG Permitting Control Panel

Selection Criteria

- type, magnitude, and hazards to be expected from each energy source used by the equipment or machine
- type and location of each device for isolating energy to the equipment or machine and the lockout/tagout method
- ID each device and the manner which energy can be stored in the equipment or machine and the procedure for dissipating the stored energy

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learning objective 4:
practice ITM scenarios

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Scenario 1

Description

A technician receives a work order to perform a routine fire door inspection.

Question

Where should the technician go to locate the appropriate documentation form?

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Scenario 1

Discussion

Name inspection criteria for this fire door inspection work order.

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Scenario 1

Question

If the technician discovers non-compliant conditions, what details should be documented?

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Scenario 2

Description

A technician wants to find information on routine maintenance requirements for fire extinguishers.

Question

How could the technician access and view these requirements in *NFPA 10, Standard for Portable Fire Extinguishers*?

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Scenario 3

Description

A technician receives a work order for routine no flow fire pump testing.

Question

Where should the technician go to locate the appropriate documentation form?

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Scenario 3

Discussion

Name testing criteria for this work order.

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