EXAMPLE Of Documentation Letter for Increased Amounts of Decorations

Step 1: Create Letter of Documentation:

Copy the exact code language onto a letterhead document of the nursing home with this suggested language:

Date:

Fire Safety Surveyor
Agency for Health Care Administration
2727 Mahan Drive
Tallahassee, Florida 32308

Reference: Categorical Waivers

Dear Sir or Madam,

In conformance with CMS S&C-13-53-LSC, (Name of Nursing Home) has elected to use a categorical waiver for amount of permitted combustible decorations as described under Section 18/19.7.5.6 (4) of the National Fire Protection Association, NFPA 101, Life Safety Code, 2012 edition.

Because this is a fully sprinkler facility, the entire nursing home is utilizing this waiver in accordance with subparagraphs (a) (c) and (d) and with special attention to the Annex material as follows:

From NFPA 101 Life Safety Code
18/19.7.5.6 (4) (4)* The decorations, such as photographs, paintings, and other art, are attached directly to the walls, ceiling, and non-fire-rated doors in accordance with the following:

(a) Decorations on non-fire-rated doors do not interfere with the operation or any required latching of the door and do not exceed the area limitations of 18/19.7.5.6 (b), (c), or (d).

(c) Decorations do not exceed 30 percent of the wall, ceiling, and door areas inside any room or space of a smoke compartment that is protected throughout by an approved supervised automatic sprinkler system in accordance with Section 9.7.

(d) Decorations do not exceed 50 percent of the wall, ceiling, and door areas inside patient sleeping rooms, having a capacity not
exceeding four persons, in a smoke compartment that is protected throughout by an approved, supervised automatic sprinkler system in accordance with Section 9.7.

A.19.7.5.6 (4) The percentage of decorations should be measured against the area of any wall or ceiling, not the aggregate total of walls, ceilings, and doors. The door is considered part of the wall. The decorations must be located such that they do not interfere with the operation of any door, sprinkler, smoke detector, or any other life safety equipment. Other art might include hanging objects or three-dimensional items.

Photographic and/or Illustrative documentation of conformance with this section of NFPA 101 is attached for your review. The actual decorations are also available for your visual survey.

If you have any questions or concerns, please let me know.

Administrator Signature

Step 2: Meet the survey team as they enter the building and give them a copy of your intent to use the Categorical Waiver and a copy of your letter of documentation.

Step 3: Document that combustible materials (decorations, photographs, paintings, etc) are in compliance with the 30 and 50 percent wall, ceiling, and door areas as described in section 18/19.7.5.6 (4) (a) (c) and (d).

This documentation can be photographs of the actual walls covered with decorations, or sketches of the walls with dimensions showing the decorations are in conformance with the wall percentages now allowed.

As explained in the Annex note, each wall and ceiling relate to the allowed percentage. This means each of the four walls of a resident sleeping room can have up to 50 percent coverage. So if a wall 8 feet high and 14 feet long has 112 SF of total area, decorations can cover 56 SF of that wall. And if a wall in a corridor is 8 feet high and 50 long and has 400 SF of area, decorations can cover 120 SF of that wall.

Step 4: Keep all Categorical Waivers in the File of the nursing home. At each annual survey, hand them to the survey team when they enter the building.