

## MINUTES

### HEALTHCARE INTERPRETATIONS TASK FORCE

16 MAY 2000  
ADAMS MARK HOTEL  
DENVER, CO

1. The meeting was called to order at 4:10 PM.
2. Members and guests present were:

NAME	ORGANIZATION
Joe Bermes*	Indian Health Service (IHS)
Tom Gardner	AHCA
Greg Harrington	NFPA
Phil Hogue*	US Army Corps of Engineers (DOD)
Tom Jaeger	AHCA
Phil Jose*	VA
George Mills	ASHE
Dean Samet*	JCAHO
Robert Solomon	NFPA
Andrew Bowman	GBA (Guest)
Gene Cable	VA (Guest)
Bob Thompson	VA (Guest)
Francis Reuer	HCFA (Guest)

\*Eligible to vote on Interpretation Issues.

3. The agenda was reviewed. An Item was added to clarify the IHS role as an authority having jurisdiction. It was also noted that based on the actions of the HITF at the New Orleans meeting, that with 6 AHJ members now on the HITF, 4 out of 6 votes by the AHJ members will be required in order to issue a response to a question.
4. The minutes of the November 1999 meeting were approved as submitted.
5. The following issues were addressed and an action was taken as noted:

**Sprinkler/Wardrobe Issue:** This item had been discussed at previous meetings, yet no formal action had ever been requested. NFPA received three letters that asked if the HITF could take a look at these items and, if appropriate, provide an interpretation. A written response from HCFA was passed out. In all three cases, since it appeared that the basis for these questions centered on HCFA enforcement of the rule, a detailed and thoughtful response from HCFA was prepared. Two primary issues were raised, the first one being that individuals should contact the regional HCFA inspectors if they are unclear on the HCFA policy on this issue. Number 2, HCFA does have a detailed policy and fix for the need, or lack of need, for sprinklers in select wardrobe units.

This policy has been widely distributed to HCFA inspectors and has been used on countless occasions to remedy the sprinkler/wardrobe problem. The HITF believe that the current HCFA policy addresses this issue. If individuals believe that NFPA 13, *Standard for the Installation of Sprinkler Systems* should be changed or modified to further address this issue, then it is appropriate for proposals to be submitted for the next revision cycle of NFPA 13. In addition, it is noted that the 2000 edition of NFPA 101: 3.3.33 now defines contents and furnishings. This should help to separate furniture objects from building objects in terms of automatic sprinkler coverage. NFPA will send a response to this effect to the individuals who have raised this issue and refer them to HCFA Interpretative Guide of 30 August 1993.

**Inspection of Fire Dampers:** This item as submitted by the Department of Veterans Affairs. NFPA 90A provides a requirement for periodic inspection of fire dampers. In some cases, modifications to building system equipment and components result in access to certain dampers being physically impossible. While any code or standard can not contemplate all future modifications or changes to a building or structure that may alter access to select equipment or component parts, both NFPA 90a as well as NFPA 101 contain language that allow these unique circumstances to be considered on a case by case basis. Based on this discussion, the HITF voting members agreed with a 4-0 vote to issue the following interpretation:

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Document to be interpreted: NFPA 90A, section 3-4.7

Edition: Year: 99

Background Information: Effective 1993, NFPA 90A requires maintenance of fire and smoke dampers, once every 4 years. In conducting these tests and maintenance several fire dampers were discovered totally inaccessible due to added utilities.

Question: Is it acceptable to exempt a fire damper from the four-year maintenance and test requirement where the physical limitations cause the damper to be inaccessible?

Answer: Yes, NFPA 90A: 1-3.2 and NFPA 101(2000 ed): 4.6.3 both contain provisions to allow alternative methods to be considered. As an example of this, the HITF notes the following text that is found in the 2000 edition of NFPA 101.

**4.6.3 Modification of Requirements for Existing Buildings.** Where it is evident that a reasonable degree of safety is provided, the requirements for existing buildings shall be permitted to be modified if their application would be impractical in the judgment of the authority having jurisdiction.

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6. A discussion was held concerning the responsibilities of IHS as an authority having jurisdiction. Joe Bermes explained that IHS provides code enforcement and code interpretation issues to facility projects and buildings. These support services are in the form of conducting plan reviews, site evaluations and approvals to indicate compliance with code requirements.

7. Old Business. Library shelf rules-NFPA 13 (VA): This item was a carry over issue from the New Orleans Meeting (See November 1999 HITF Minutes) There is no new or follow up information on this subject at this time.

As a point of information, the comments from the HITF to the NFPA Standards Council (See November 1999 HITF Minutes) concerning the viability and future of NFPA 82 were persuasive enough to maintain this project. Additional members are being now being added to this committee.

An inquiry was made concerning moving forward with a possible TIA to NFPA 101 (2000 and 1997 edition) relating to the arrangement of special nursing suites and the direct visual supervision issues. As soon as an endorsement from a member of the Safety to Life Healthcare Committee is received, the procedures to formally evaluate this as a TIA can begin.

8. New Business. There were no additional items brought fourth.
9. Date and location for next meeting. The HITF will plan to meet in November of 2000 during the NFPA Fall Meeting in Orlando, FL. This is scheduled for 12-15 November 2000. Exact date and time will be determined later.
10. Adjournment. The meeting adjourned at 6:10 PM.

Minutes prepared by Robert Solomon, PE NFPA